

**From:** Robyn Orloff <robyn.orloff@icloud.com>  
**Sent:** Thursday, December 15, 2022 2:59 PM  
**To:** parkspubliccomment@carson.org.  
**Cc:** Jennifer Budge <JBudge@carson.org>  
**Subject:** Special meeting Friday 12/16/22

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Re the OSAC-Parks and Rec Special Workshop Friday 12/16/22: I received the Agenda on Tuesday December 13, 8:55 AM: <https://www.carson.org/home/showpublisheddocument/82943>

I did not see any Supporting Documents, so requested them, on Tuesday December 13, 11:34 pm.

I was told on Wednesday 12/14/22, 8:57 am: "This will be an interactive workshop type format so there are currently no supporting materials. If the consultant does have any handouts, we will post them as late material."

However, today Thursday 12/15/22, 10:11 am: I was sent the Late Material Supporting Documents. Thank you.

But at 1:27 pm it was still not on the Agenda listed on the [Carson.org](https://www.carson.org) website. Or the link I originally received and just checked: <https://www.carson.org/home/showpublisheddocument/82943>.

I appreciate getting the personal notification, per my being on the list for that — and the Supporting Documents, per my request December 13, 11:34 pm (received Supporting Docs 12/15/22). However, how will the rest of the Public be informed of the specific Agenda items — in order to perhaps formulate their public comments relevantly. As of today 1:41 pm — the Supporting Doc was still not on the [Carson.org](https://www.carson.org) Home Page Meeting List: <https://www.carson.org/government/city-meetings/agendas/board-of-supervisors-agendas-with-supporting-materials/2021-agendas-with-supporting-materials/07-15-21-agenda-with-supporting-materials>

I hope that in view of the above lack of Supporting Documents prior to the meeting, the Public will be allowed to comment after each Agenda Item — after listening to the discussions.

I don't have much time to write a public comment based on the 37 pages of Supporting Docs, so I will do what I can before the 3 pm deadline.

A). Please consider the below resignation of one of our very knowledgeable and supportive of Open Lands OSAC members, as posted on the BOS Agenda 7/15/21 Supporting Materials, Agenda Item 15B. <https://www.carson.org/government/city-meetings/agendas/board-of-supervisors-agendas-with-supporting-materials/2021-agendas-with-supporting-materials/07-15-21-agenda-with-supporting-materials>

This member contributed positively towards all discussions and understood the mission statement of the OSAC — and how it is very different from Parks and Recreation. IMHO (and perhaps hers) there is not enough understanding by some of the members, re the difference in their lands and the use of their lands. Recreation is very different in Parks and Rec, than in Open Space — and the properties/use/ and management goals are totally different. I hope you will be discussing these differences in your Special Workshop, as they re written in 13.02 and 13.06 respectively.

What I see as a very relevant excerpt from the above resignation letter, imperative for all of us to consider:

**“Please don’t ever forget that our charter has been to protect Open Space (not parks) and that we are charged with protecting the Carson River as well as the upland properties in our care”.**

B). To clarify, as I read this, Open Space needs to be protecting not only the River along Silver Saddle and Buzzy’s Ranch and the environs and associated PH Open Space land — but also the upland sagebrush ecosystem on Prison Hill that extends from the River up to the ridge line on the east, and down the other side on the west.

IMHO, heavy construction of the very visually and land impactful (to intact flora, fauna, wildlife habitat) CRT II, through a mile(+) of intact sagebrush ecosystem, defies 13.06 and the attached PH Conservation Easement. I would expect this constructed engineered ‘road’ (nonOHV road/trail — although frequently trespassed by OHVs) would be more of a Parks and Rec feature — not a ‘trail’ through our ‘natural environment’ that per

\*\* the Powers and Duties of OSAC it is, to "promote the quality of life for citizens of Carson City through the preservation and protection of the quality of the natural environment".

\*\* 13.06 purpose: “preservation and protection of the quality of the natural environment which has given Carson City much of its character.....”.

“These natural areas.....are intended to be preserved and protected for the enjoyment of this and future generations by the judicious funding for open space”.

C). Seems to me that Open Space staff and OSAC should be yes certainly encouraging recreational use of these properties, but in a natural integrated-into-the-environment way that achieves protection of the properties while allowing recreational use. IMHO AASHTO guidelines — engineering per FDOT? — are NOT appropriate for Open Space land. ADA yes, where topography and features allow it — but AASHTO is inappropriate, way too high a level of impact to the land than IMO is sustainable practical or respectful to the natural resources.

And one ask oneself, why is a 10-12-15’ heavy machinery constructed (in NON-vehicle designated property) hard road base surface, with 3’ wide shoulders, and rock containment walls and drainage ditches (rock not compatible integrated with the land sand or rock — stands out like on a vehicle designed road) considered compatible or appropriate on Open Space land? Oxymoron, IMO.

When I asked an OSAC member what she thought of making the V&T an ADA and AASHTO designed trail, she asked me what an AASHTO trail is. Really? But she voted for CRT II to be constructed in Silver Saddle environs — in its view shed. And all around Prison Hill. CRT II is visual impact looking up from the ranch, and down from the road/trail and from the North Loop above it. Without knowing before hand what AASHTO is? CRT III will just extend these impacts, around the entire Prison Hill!!!

D). Similarly let’s talk about the OHV area of Prison Hill, above the River, in the Watershed of Carson River AND Clear Creek. AND it is the Carson River uplands, that should also be protected by Open Space

per above 13.06 and Conservation Easement docs — and even the Open Space Management Plan (and City Master Plan — protection of view sheds and gateways to City and our natural resources).

1). Please don't ever put words in my mouth, or say I am against this OHV project. I have NEVER been against the project — from the very beginning — per ALL my written and spoken public comments and webcast recordings. However, yes, I am against SOME of the features of the Plan, as designed and implemented — by our Consultants/Contractors/and Open Space — and rubber stamped by Open Space staff — and unanimously approved by OSAC (without even seeing or discussing or approving the 3 successive Trail Plans!) OR staff and OSAC walking all of the property/trails so they know what they are approving.

2). And walk you must, as much of the heart of the project is not accessible by vehicles — unless you have a highly modified Rock Crawler. And how many of you know the difference between a Crawler — Wheeler — SxS — UTV — ATV — dirt bike — trials bike — MX bike. OR the difference between the trails designed for them — and which can go on which trails.

Who among you can name a few trails and describe their features — and their impact on the land — and the compromises made — and discuss which compromises are appropriate and necessary — and which could be blatant violations and thus are sacrifices. And the rationale for the sacrifice?

**ASIDE: You would need to know all this (and the below topics) — to vote on and support every action associated with the project. You are ADVISORY to Open Space — not Open Space Advisory to you. As such, you should know about this project personally objectively from your own observation — not from what you are told by Open Space, right? If the latter were the case, wouldn't they would be advising YOU!????**

3). Specifically, who among you have walked in the ephemeral stream wash and up on the rock out crossings of the Crawler Routes? Can describe the differences between the 5 routes in the West Basin? And how they are different even from all the ephemeral stream wash routes within the 3 Open Areas. And how are the 3 Open Areas different? In size, rock features, washes within them? Topography, difficulty. These are features that should be part of an Open Space discussion — very different from Parks and Recreation land and use.

4). And who among you can define “bedrock controlled” — what does it mean, and where in the OHV area is it bedrock controlled? And how do the washes and Open Areas and main trails feature bedrock controlled — where on their routes, % of bedrock controlled vs sand.

5). And can you point out on the property, where OHV use has actually increased erosion and disturbance (specifically in the sand-controlled areas!)— compared with ‘just nature’.

6). And how many of you can describe the wash trails — and % of sand vs rock? And point out where there is impact. And where there is disruption of the intact soil and vegetation that Ms. Zonge documented in her Power Point Boots on the Ground presentation to Open Space (2x in November 2021). And how many of you closely read her report — and compared it to the Final RCI report? (This is public record available for your perusal). And how many of you can you say how the impacts noted and predicted in the report, are protected per the final RCI report? Or are being impacted daily, because of permission to do so?

7). And, can our Natural Resource Professionals cite scientific articles re Ephemeral Stream washes? — and why most advocate protection of these important natural resources.

And why Open Space has decided to override most scientific recommendations, and put the most impactful OHVs (Rock Crawlers) up our ephemeral stream washes?

One of which is narrower than the Crawlers — and should be protected per the Open Space's own "Know Before you Go" rules.

8). And how many of you have read those rules — and thought of them in view of what is going on on the Hill?

"OK to ride existing Trails". "Open Areas are Freestyle X-Country Riding Areas" — and know where the documented areas of intact biotic crust and vegetation exist there

(per the Power Point Study) and Why/where Open Space is inviting and allowing active destruction of it per designation of the Open Areas? Nope, Open Areas are NOT ALL BEDROCK CONTROLLED (per the Power Point Study).

Hey, I love riding all the existing trails. That opened up a whole new world to my dirt bike riding. I had been carefully following the Avenza App (BTW, how many of you know what that is and how to use it, on this property and everywhere on public lands?). I stopped at every unsigned intersection (which is everywhere on the Hill BUT in the West Basin which is only about 30% of the property). Slowed me down, stopped the flow of my riding. Which was OK, I was out there to enjoy the environment — not just for the challenge of riding. I had walked or run every designated trail using the app to find them — but hard to remember when out on the bike, what is designated what is not, with so many trails out there.

I saw few to no other riders doing the same. So when Gregg told me I could ride the existing trails — and I saw that on the published rules — I started to do just that.

I would say that these 'existing' trails are mostly awesome — and improve the riding experience (for 2 and 4 wheelers — as the existing trails are both) — increase the depth and breadth of the riding experience. I wholeheartedly advocate adding most of them to the plan. 20+ miles of trails IMHO is not enough for this OHV area. It had 70+ at the outset of the project.

I would say even more than 70+ now -- since trails are being user added weekly, then essentially are 'existing' trails after they are ridden by others and established.

I encourage re-evaluation and inclusion of most of these trails.

And even re-drawing the boundary above the River, to include more of these trails (which are being ridden anyway — easy to trespass the boundary).

Perhaps they are high enough above the River to not heavily impact the watershed — any more than the trails already designated and in the ephemeral streams that ultimately impact the Carson River and Clearcreek Watersheds!!!! And if done sustainable on contour lines (where most already area) — not on the fall lines (close those trails? Sooner rather than later) — then what is the harm? Careful consideration and sustainable trail design. And there is an awesome viewpoint outside of the now boundary above the River — used historically for decades by riders — and not on a fall line (whereas there are many many fall lines included in the existing and added trails, in the project all over the Hill now).

Why isn't the OSAC involved in some of these decisions?

E). Summary: This is a disorganized public comment, due to lack of time. Unable to totally apply it to the Supporting Documents — but those DO speak to the differences between 13.02 and 13.06 and how

to honor each, in each committee, on Recreation vs Open Space lands. And I am asking specifically how Open Space is honoring their 13.06 and relevant documents?

Or are they getting their mission confused and overlapping with Parks and Rec 13.02? I think Parks and Rec is RIGHT ON — and applaud their many projects and improvements in our Parks and Rec land and facilities.

This is a plea to for Open Space to acknowledge that they have a different mission and goals than Parks and Rec and Open Space. Park Planning background might not be relevant for Open Space decisions — without careful thought. Very different expectations between the two Commissions, for the recreational uses and protections.

I hope this Special Workshop will address and clarify. My above examples I think are relevant to where OSAC (and even staff?) might be misguided or intermingling vs defining and implementing the differences.

Hopefully you all will reestablish and identify where the two Committees differ — vs bringing them closer together, diluting IMHO, the Open Space Dept and OSAC mission.

Thank you for reading,

Robyn Orloff

Carson City resident --- who appreciates all the Open Space and Parks and Rec staff and Commissions do, to make Carson City the awesome place to live

and recreate, that it is.

Thank you for that.