



Nevada Association of Counties

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Carson City, NV 89703

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June 10, 2020

Assemblywoman Monroe-Moreno
Senator Chris Brooks
401 South Carson Street
Carson City, NV 89701

Dear Assemblywoman Monroe – Moreno and Senator Brooks,

This letter is being submitted on behalf of the Nevada Association of Counties (NACO) in response to your request for feedback on the proposals and potential policy solutions presented during the interim meetings of the SCR 3 – Working Group.

First, I'd like to thank you for including NACO as a member of the Working Group, we appreciate the opportunity to be part of this important discussion. Further, thank you for inviting NACO to present, along with Washoe County, Clark County and Carson City, at the March meeting of the Working Group to discuss local road needs and funding.

As we shared at that meeting, Counties maintain nearly 75% of Nevada's road miles and are a critical part of our state's transportation network. Similar to the State, local road cost obligations outpace both fuel revenues and other local funding sources. As you know, county roads are primarily funded through local fuel and sales taxes, and NACO advocated for SB48 in the 2019 Legislative Session to enable rural county commissioners to have a way to raise local diesel taxes for road construction and maintenance.

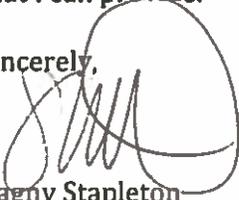
As a result of the passage of SB48, White Pine, Pershing, Carson City and Lyon Counties have all voted for ordinances to levy a tax on diesel fuel to pay for local roads. Elko County supported SB48, but previously passed their own local sales tax during the recession to fund road and other infrastructure needs in the County. In the past decade over half of our rural county commissions, twelve to be exact, have voted to increase local taxes to fund road construction; and Clark and Washoe counties have voter approved fuel tax indexing.

We appreciate your leadership on this issue and realize that no easy task lies ahead to modernize a decades old and outdated transportation funding mechanism. We agree that any proposed reforms should reflect the state's commitment to environmental stewardship as well as this important infrastructure network. We appreciate the partnership you have created with local government and look forward to continued conversations. Our request on behalf of counties is that any future policy

proposals include a local option to fund local roads. Proportionate funding for local needs is critical to maintain a safe, efficient, and up to date transportation system throughout Nevada.

Thank you for your consideration and for allowing Working Group members to provide feedback. Please do not hesitate to contact me if there are any additional questions you have or information that I can provide.

Sincerely,



Dagny Stapleton
Executive Director





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June XX, 2020

Bureau of Land Management Nevada State Office
Attn: Kathryn Dyer
Range Program Lead
1340 Financial Blvd.
Reno, NV 89502

cc: Jon Raby
BLM Nevada State Director
1340 Financial Blvd.
Reno, NV 89502

RE: Nevada Association of Counties Comment on the Bureau of Land Management's Draft Environmental Assessment for Targeted and Prescribed Grazing of Annual Grasses in the Great Basin Ecoregions of Nevada. DOI-BLM-NV-0000-2019-0003-EA.

Dear Ms. Dyer:

As the state association for all 17 of Nevada's counties, the Nevada Association of Counties ("NACO") appreciates the opportunity to provide comment on the Bureau of Land Management's ("BLM's") Draft Environmental Assessment for Targeted and Prescribed Grazing in Ecoregions of the Great Basin of Nevada. NACO provides comments as the collective voice on behalf of all of Nevada's counties, but defers to individual counties that have provided county-specific information or positions that may be in conflict with NACO's position.

Introduction:

NACO is pleased to see the BLM taking a comprehensive and proactive approach to improving fire resistance and resiliency of rangelands in the Great Basin. This EA, along with BLM's recent Fuel Breaks PEIS, Fuels Reduction and Rangeland Restoration DPEIS and the Categorical Exclusion for Pinyon Juniper management should create a suite of tools for the BLM to utilize to help reduce the frequency and intensity of fires across the Great Basin.

Nevada's counties also bear immediate and long-lasting socioeconomic impacts from wildfires in the Great Basin, fires that threaten lives and livelihoods. For instance, county resources are often the first response when wildfires break out. Aside from the obvious threat to health and safety, wildfires result in major negative economic impacts; including the cost of first-line response, repairs to county infrastructure, and secondary impact to county economies from damage to resource based industries.

For many Nevada communities, resource-based industries that are tied to public lands are their lifeblood, and the proliferation of wildfire poses a unique threat to those communities.

Coordination and Cooperation with Counties

NACO appreciates the BLM's recognition of counties that were cooperating agencies in this draft EA process, as well as recognizing counties that provided input but were not formally cooperating agencies. Most notable, NACO is pleased to see the BLM made a concerted effort to plan the EA to be consistent with county plans and policies. Appendix G, discloses respective county master plans, land use plans, policies, and regulations to ensure that the EA was consistent with county plans.

Socioeconomic Impact Analysis

FLPMA, NEPA, and their implementing regulations require BLM, to the maximum extent possible, align with and mitigate impacts to State and local government planning needs, with the understanding that "socioeconomic impacts are usually indirect and largely fall on communities and local government institutions."

NACO is pleased to see the inclusion of the socioeconomic impact on each county in the planning area included in this EA. As this document describes, the economic impact of ranching varies in the 16 communities in the planning area. Nevertheless, many Nevadans live and work in the communities in which they live, because of the open spaces, values, and lifestyle that community provides. The socio-economic impact of ranching therefore is not merely economic but also social.

NACO appreciates the BLM's partnership with the University of Nevada, Reno, (UNR) the U.S. Forest Service and counties, through the Nevada Economic Assessment Project (NEAP) to create socioeconomic baseline data for Nevada's counties. A part of the project includes input from community members to identify qualitative "community assets". The socioeconomic impact analysis in this EA might benefit by incorporating this information, to better capture the social and cultural importance of grazing to the communities in the planning area.

Working with Permittees

NACO supported the inclusion of targeted grazing as a fuel reduction and rangeland restoration tool in the BLM's recent DPEIS. In those previous comments, we emphasized the need for the BLM to coordinate grazing projects with the permittee so that an activity would occur within the authorized permitted rotation. We also emphasized that any project be the result of a voluntary agreement between the permittee and the agency. NACO is therefore pleased to see that targeted or prescribed grazing by a permittee under this EA is exclusively the result of a voluntary agreement. Nevertheless, to be a widespread and effective tool in mitigating rangeland fires, the process for implementing targeted grazing plans between the authorized permittee and the BLM, should be efficient and streamlined to incentivize the use of targeted and prescribed grazing.

Conclusion



We would like to thank the BLM for their consideration of the input and recommendations of Nevada's counties. Any changes to public land management in Nevada effects our residents, county functions, and the ability for counties to serve their citizens' basic needs. We look forward to continued engagement on this matter. If you have any questions, please do not hesitate to contact me at dstapleton@nvnaco.org, or by phone at (775) 883-7863.

Respectfully,

Dagny Stapleton
Executive Director

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