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**MOTORCYCLE RACING ASSOCIATION OF NEVADA (MRAN)
AMERICAN MOTORCYCLIST ASSOCIATION (AMA) District 35**

Nevada non-profit 25079-2004

8913 COLORFUL PINES AVE., LAS VEGAS, NV 89143

Reply to – 7770 Quarter Horse Ave. Pahrump, NV 89061

June 14, 2019

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3 **SUBJECT:** A BILL To provide for conservation and economic development, designate
4 certain mountain peaks, and modify the boundaries of certain national recreation areas
5 in the State of Nevada, and for other purposes. Short Title, **SOUTHERN NEVADA**
6 **ECONOMIC DEVELOPMENT AND CONSERVATION ACT** (May 10, 2019 Discussion
7 draft released June 6, 2019), AKA Clark County Federal Land Bill.

8

9 Dear Senator Cortez Masto,

10 The Bill divides the remaining BLM public land in Clark County Nevada between
11 Preservation and Development. Preservation gets the lion's share. Development gets
12 the rest. People who play on public land are left with crumbs. Decades of splitting
13 public land between Development and Preservation has squeezed out People who play
14 on public land. To stop the squeeze former Dept. of Interior (DOI) Secretary Zinke
15 elevated Recreation on par with Development and Preservation dividing up the rest¹.
16 Disposal sales for Development and closures for Preservation must be reviewed to

¹ DOI SO 3365, SO 3366, April 18, 2018

17 determine how they affect Recreation. Zinke's successor, Secretary Bernardt doubled
18 down on that policy.² Clark County's Bill is contrary to and will override current federal
19 policies if passed.

20

21 Stakeholder Participation Issues:

22 Developers, Preservationist, and County officials sat down to divide the
23 remaining BLM managed land a year before their having done it was public information.
24 March 2018 an article in the Nevada Independent newspaper reported a plan in the
25 works. Clark County didn't respond to my emails, but stated the plan had been
26 abandoned in a phone conversation. Clark County publicly released the plan docs June
27 6, 2018, just 12 days before Clark County Board of Commissioners passed the plan
28 June 18, 2018.³ Next agenda item they voted to form the Clark County OHV Advisory
29 Committee (CCOHVAC) to represent Offroaders working out the details. CCOHVAC
30 came into the process with the big decisions already made. And it was obvious from
31 the start Preservationist had the greater say. At the May 29, 2019 CCOHVAC meeting
32 Staff announced the Bill had been completed and sent to the (Nevada's Congressional)
33 Delegation.

34 CCOHVAC's biggest task should have been writing the parameters for writing the
35 Travel Management Plan (TMP) followed by writing the TMP. They didn't get to that.
36 That should have been addressed because the TMP says where People can ride.

² DOI SO 3373, SO 3374, May 21, 2019

³ Public Release, Clark Co. Public Lands Proposal Supporting Doc, 06/062018

37 Instead of addressing it then, a TMP shall be completed within 2 years after date of
38 enactment of the Act. But that TMP is only for the 4 OHV Recreation Areas.⁴ What
39 about the rest of public land in Clark County? And if the same Minimalization is applied
40 to writing the TMP as determining OHV area boundaries, the 11,151 miles of dirt roads
41 and varied existing trails⁵ will likely be reduced to a few hundred. That concentration
42 will turn fun rides into crawling processions people in places with Minimalization TMPs
43 begrudgingly call Dust Caravans. Minimalization degrades Nature and the Offroader's
44 experience because Sustainable Use is by Dispersed Use, and typical Offroaders go to
45 public lands to get away from crowds.

46 Minimalization is policy based on the belief People don't belong in natural places,
47 but the People who use public land should get at least something. Offroaders had
48 access to millions of acres in Clark County thru the last century. Down to about a
49 quarter of a million acres now. If the Bill becomes federal law OHV events will be
50 concentrated into 3 areas totaling 101,031 acres⁶ of the 2.9 million acres of BLM
51 managed land in Clark County. That's about 3%. Much of the areas given are
52 unusable by lack of access, unsuitable terrain, or boundaries that fragment existing
53 USFWS (US Fish & Wildlife Service) approved racing loop trails. Logandale Trails
54 (21,756 acres) is a 4th OHV riding area where no racing is allowed. Again,
55 concentration of the growing number of Offroaders into smaller areas degrades Nature

⁴ TITLE VIII SEC 801(d), Bill Discussion Draft May 10, 2019

⁵ 2014 BLM SNDO RMP, LVFO 3.2.5.1.8

⁶ Clark Co. Map April 2, 2019, Logandale Trails, Nelson Hill, Sandy Valley, and Laughlin OHV Recreation Areas.

56 and the offroad experience because Sustainable Use is by Dispersed Use and typical
57 Offroaders go to public land to get away from crowds.

58

59 The Act exaggerates the need to protect Nature from People:

60 1. Travel by OHVs is the way most of the public accesses undeveloped public land,
61 yet OHV trails cover less than 2/10 of 1% of the planning area.⁷ Where use is
62 noticeable is because of concentration of use. Passing the Act will substantially
63 further concentrate use.

64 2. The Natural Values of substantial areas are already protected by restricting use.

65 There's 951,355 acres of existing ACECs.⁸ For people who want completely
66 natural experiences where OHVs aren't allowed there's existing 427,029 acres⁹
67 of Wilderness in Clark County and southern edge of Nye County. Wildernesses
68 are places that bear no signs of presence of mankind and are kept that way by
69 prohibiting access by vehicles, even bicycles. Overcrowding isn't a Wilderness
70 issue, yet the Bill proposed designating more, including Crescent Peak.

71 Crescent Peak is a popular offroad riding and racing area. Many times over
72 years many places ridden and raced for decades have been designated as
73 Wilderness, closing most access. That places we'd ridden and raced for
74 decades qualify as Wilderness; our tracks can't be as deep as some allege.

⁷ 2014 SNDO RMP 2.5.2.13, 3.2.14, 4.2.14.1-7, D.1-D.21

⁸ 2014 BLM SNDO RMP Table 3.49

⁹ 2014 BLM SNDO RMP Table 3.53

75 Overcrowding isn't a Wilderness issue. Overcrowding is becoming an Offroading
76 issue, yet the Bill substantially reduces areas for Offroaders.

77

78 Conservation and Preservation are used as if Interchangeable:

79 1. Conservation is management for Sustainable Use going back to original
80 Conservationist, Teddy Roosevelt and Gifford Pinchot.

81 2. Preservation protects Nature from People based upon the premise that natural
82 places can't be natural if people are present. The Preservationist want to remove
83 the public from public land. Preservation plans are measured by how many
84 years it will take to restore public land to how they looked before people.

85

86 Inconsistences and Conflicting Policy application:

87 1. Critical Tortoise Habitat: The Act closes Jean and Primm areas to racing
88 because they're Critical Tortoise Habitat. They've been Critical Tortoise Habitat
89 for years. Racing is allowed there, but limited by dates and times when tortoises
90 aren't active. Nelson Hills and Laughlin OHV Recreation areas area also Critical
91 Tortoise Habitat. Yet the Bill will allow racing there. Why change a policy that
92 works? Why apply the change to only 2 of 4 areas?

93 2. Everything's worked out ahead of time for utility corridors and the proposed
94 airport. The details pertaining to Recreation are to be worked out later. That

95 leaves People who recreate on public land hoping for the best and too late to fix
96 what doesn't work out.

97

98 Collateral Considerations of passing the Bill:

- 99 1. It will exacerbate the rural-urban divide by urban values overriding the best
100 interests and values of citizens living in surrounding small and rural communities.
101 They're the citizens most directly affected.
- 102 2. What about Nevada's other 24 counties? Add a Rider to the Act that lets them
103 override federal policies they disagree with?

104

105 Fixes:

- 106 1. Strike TITLE II, SEC. 202 (a), & (b)(1), (c)(1), SEC 206(b)(C), SEC 208(a),
107 SECTION 209(a).
- 108 2. Strike TITLE III. There's already more than enough of Clark Co. preserved as
109 Wilderness.
- 110 3. Resource Management Plans (RMPs) are typically written by federal agencies.
111 2014 the BLM released a Draft Resource Management Plan.
- 112 4. MRAN endorses the 2014 BLM RMP alternative 3, the Preferred or Balanced
113 alternative. We ask it to be implemented with DOI edits already made.

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116 A Little Bit About MRAN:

117 MRAN has been in continuous operation since 1968 sanctioning off-highway
118 motorcycle and quad events in Nevada's Clark, Lincoln, Nye, and White Pine counties
119 and Mohave County Arizona. We're a registered Nevada non-profit and the southern
120 Nevada American Motorcyclist Association (AMA) affiliate. Our events serve all skill
121 classes and age classes. We enjoy time spent in the desert and places our rides take
122 us. People are better by time spent in natural places. Offroading with families and
123 extended families of friends is the best way to be there. Conservation by Sustainable
124 Use better serves Nature and People. Managed Use is not abuse. We don't have to
125 protect Nature from current generations to be there for future generations because
126 Nature is renewable.

127 We'll appreciate your consideration of our concerns and we're at your service as
128 public land stakeholders and conservationist. Thank you and our best regards.

129

130 Sincerely,



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132 Robert Adams, MRAN Legislative Officer