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STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
State Land Use Planning Advisory Council

November 10, 2022

Tracy Stone-Manning
Director, Bureau of Land Management
1849 C Street NW
Washington, DC 20240

Re: BLM Nevada-wide Resource Management Plan (RMP) Modernization Project

On behalf of the Nevada State Land Use Planning Advisory Council (SLUPAC), I am writing this letter, approved by SLUPAC on November 10, 2022, to provide the Council's comments on the Nevada-wide RMP Modernization Project. SLUPAC appreciated the project presentation provided by BLM staff at its August 19th meeting in Elko. The presentation was informative and provided SLUPAC with an opportunity to ask questions and share input on the effort to update all RMPs throughout Nevada.

SLUPAC is the only Governor-appointed council that has a county representative from each of Nevada's seventeen counties as well as the Nevada Association of Counties (NACO), the Nevada League of Cities & Municipalities, and the Nevada Indian Commission. SLUPAC provides recommendations and expertise on land use planning and natural resources issues and advises the State Land Use Planning Agency regarding the development of plans and statements of policy.

According to the presentation, the average age of a Nevada RMP is currently more than 22 years. During this time, new issues have arisen related to land use changes caused by urban development and changing conditions on Nevada's public lands. Additionally, there have been significant policy changes related to recreation, energy production, mineral extraction, land leasing, agriculture, wildfire management, military activities, transportation, and many other land use planning issues. SLUPAC endorses and supports BLM's initiative to update the RMPs as appropriate, and suggests the update process happen openly and collaboratively with a continued focus on local involvement and coordination. This way, the RMPs can be responsive to these issues and changing conditions for improved land use planning throughout the state.

For example, across the state, Nevada's communities are struggling with achieving housing affordability and availability. There is a statewide deficit of 105,575 affordable housing units and

available rentals for households making less than 50% of the state's median income. The lack of affordable and available housing has impacted quality of life, hurt local economic development, and reduced workforce development and attraction efforts in every community. Many communities are surrounded by BLM lands and do not have enough room to grow to meet their housing needs or implement local Master Plan goals and community growth and infrastructure needs. SLUPAC believes that a collaborative and public process will help ensure housing issues are appropriately captured and addressed in the updated RMPs, as realty disposal actions and rights of way for infrastructure. This is just one of many examples of land use planning issues that should be part of the RMP update process.

Key to the success of a comprehensive RMP update is to work in close partnership with, Local Governments, Tribal Nations, and State Agencies throughout Nevada in a meaningful, collaborative, and transparent manner. With about 67% of Nevada being managed by the BLM, the economies and land use plans of the State, Tribal Nations, and Local Governments will be impacted by the decisions and land allocations made through this planning effort. These stakeholders can provide the BLM with local knowledge and an on-the-ground understanding of land use planning policies and land management activities across Nevada's public lands. To help give the RMP update process the best chance of success, it will be critical to remain in close communication with these stakeholders and coordinate efforts at each step in the planning process.

SLUPAC acknowledges the challenges, including staffing, resources, and funding, associated with a comprehensive update to all of Nevada's RMPs. The alternative, to amend RMPs as needed for just one or two issues, on a project-by-project level, has not been working for Nevada's communities. Projects remain backlogged as they individually make their way through the queue, and the large planning trends and issues stated above do not have a chance to be comprehensively evaluated. Although there are risks in undertaking a statewide update, such as complex local policy issues or land management decisions under one RMP affecting the update of other RMPs or causing the process over all to slow down, SLUPAC believes this risk can be minimized through proactive engagement and coordination with local, state and Tribal stakeholders. So that the RMP update can be given the best chance of success and to ensure an effective collaboration with all stakeholders, SLUPAC supports the BLM securing the additional personnel and resources necessary to complete the initiative and implement the RMP. Without them, this large undertaking will be very difficult to accomplish and would typically take several decades under the traditional sequence of RMP timelines.

In conclusion, SLUPAC supports the goal to update Nevada's public land use plans and hopes that this letter serves to inform and help guide BLM as it works to accomplish the Nevada-wide RMP Modernization Project. If you have any questions or would like additional information concerning SLUPAC, please feel free to contact Scott Carey, State Lands Planner at 775-684-2723 or scarey@lands.nv.gov.

Sincerely,



Jake Tibbitts, Chair
State Land Use Planning Advisory Council

CC:

Governor Steve Sisolak

Senator Catherine Cortez Masto

Senator Jacky Rosen

Congresswoman Dina Titus

Congressman Mark Amodei

Congresswoman Susie Lee

Congressman Steven Horsford

Jon Raby, Nevada State Director

Inter-Tribal Council of Nevada