



December 7, 2016

Nellis Air Force Base

99th Air Base Public Affairs
4430 Grissom Avenue, Suite 107
Nellis AFB, NV 89191

Subject: NTTR Military Land Withdrawal and LEIS Scoping Comments

Dear Ladies and Gentlemen,

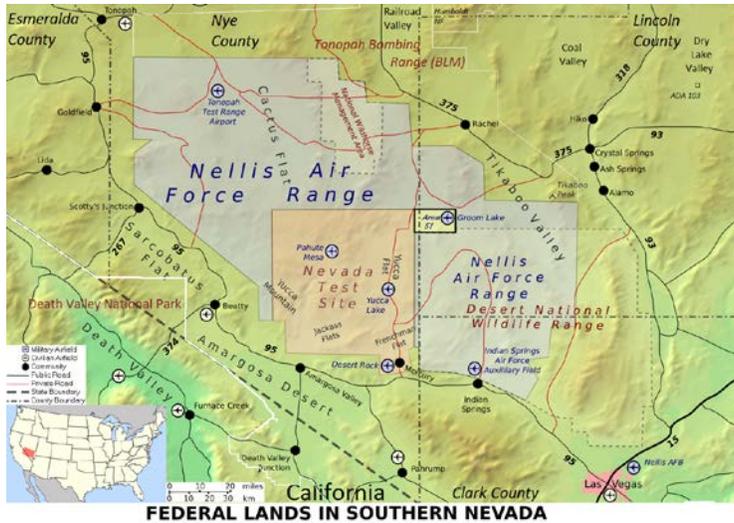
The Fraternity of the Desert Bighorn (FDB) is providing the following public scoping comments regarding the Notice of Intent (NOI) issued by the United States Air Force (USAF) to prepare a Legislative Environmental Impact Statement (LEIS) for the Nevada Test and Training Range (NTTR) military land withdrawal at Nellis Air Force Base (NAFB) from the Desert National Wildlife Refuge (DNWR).

As wild sheep conservationists know, the DNWR is the hub of desert bighorns in Southern Nevada. Its location is also strategically important for military training. Over half the area of the DNWR is designated as part of the NTTR, which means that the readiness mission must be coordinated with the conservation mission carried out by the US Fish and Wildlife Service (FWS). That mission – which was and is the primary reason for the creating of the refuge in 1936 – is to *perpetuate desert bighorn sheep and its habitat*.

The USAF now proposes to expand the readiness mission to approximately 75% of the entire DNWR. Important scoping comments must be considered from the standpoints of conservation and military readiness. The FDB is providing the following comments after appearing at the public forums, and engaging in direct discussions with the USAF, FWS, and the Nevada congressional delegation. We offer the following scoping comments for your consideration as part of the rigorous and searching debate about the future of the DNWR, NTTR, and the desert bighorns that compose the main strength of the species population in Southern Nevada.

While we appreciate and praise the Department of Defense (DOD) and USAF for their cooperation with FWS and the Nevada Department of Wildlife (NDOW) for their efforts and cooperation to investigate and study the bighorn sheep herds within the NTTR, consideration must be given to the long term viability and sustainability of these bighorn sheep populations within both the existing NTTR and the proposed expansions.

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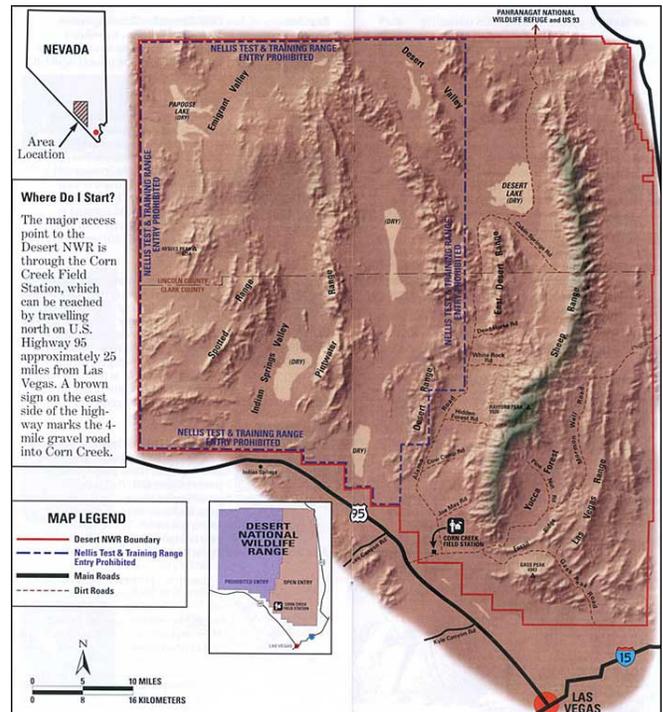
The first and foremost comment regarding the proposed NTTR expansion that has not been clearly explained or presented during the public scoping meetings or alternatives centers around the USAF readiness mission requiring all this additional land. Based on questions asked at the public scoping meeting it does not appear that the USAF considered conducting an assessment to locate suitable terrain within the 2,949,603 acres already a part of the Federal Withdrawn Lands from the public domain for the NTTR, Nevada National Security Site (NNSS), also known as the Nevada Test Site and Nellis Air Force Range complex to serve the needs of the proposed readiness mission expansion.

Further, the alternatives presented at the public scoping meeting do not present a proper range of viable alternative options, that is to say – only one satisfies the USAF readiness mission. There are numerous relevant considerations that are directly related to the FWS mission on the DNWR that were not presented or considered in the proposed alternatives, which are paramount to an objective scientific alternative assessment analysis with the goal being to arrive at a mutually satisfactory solution to both the USAF readiness mission and FWS mission to conserve habitat for the protection and enhancement wildlife and enjoyment of the public.

The DNWR is a protected wildlife refuge administered by the FWS located just minutes from Las Vegas, Nevada in northwest Clark and southwestern Lincoln counties for public enjoyment. The DNWR was created on May 20 1936 as the largest wildlife refuge in the lower 48 states of the United States with the primary objective to *perpetuate desert bighorn sheep and its habitat*.

The DNWR actively improves bighorn habitat by developing new water sources and maintaining and improving existing ones that also benefit sixty-seven (67) other wildlife species through partnerships with the Nevada Department of Wildlife (NDOW) and volunteer groups like the Fraternity of the Desert Bighorn.

The DNWR contains six major mountain ranges with bighorn sheep populations, including the Sheep Range, with peaks up to 10,000 feet and valleys at 2,500 feet Above Mean Seal Level. Annual rainfall in the DNWR varies from less than four inches in the valleys to over fifteen inches on the mountain peaks making artificial water developments to capture and store annual precipitation essential to the survival of wildlife during long periods of drought.



Water resources and NDOW's investments on behalf of the State of Nevada are considerable within the proposed NTTR Land Withdrawals. Water developments are classified as including a means of collecting, storing and making water available for desert bighorn sheep and the other sixty-seven species of wildlife that inhabit the DNWR. Occasionally these developments can be attached to an existing spring source as a means of collection, the design and function of which can vary from site to site. Some are located near roads whereas others are extremely remote, where the animals live. These water developments represent a significant capital investment by the State of Nevada in rangeland improvement. Additionally, there are developed spring flows which consist of a means of collecting spring water and making it available for bighorn sheep and other wildlife. The DNWR has always been supportive of the desert bighorn recovery program in Southern Nevada – *it is the primary mission of the refuge.*

There are currently eighteen (18) water developments located within the NTTR 2000 National Defense Authorization Act (2000-NDDA) in the Spotted, Pintwater and Desert mountain ranges. These are: (1) Desert #5 (Brent's Seep); (2) Quartz Spring; (3) Sand Spring; (4) Desert #3 (Tommy); (5) Indian Canyon; (6) Desert #1 (Chuckwalla); (7) Dejesus; (8) Gravel Canyon; (9) Spotted #4 (Foggy); (10) Spotted #3 (Patches); (11) Spotted #1; (12) Spotted #2 (Split Apron); (13) Spotted #6; (14) Dain Peak; (15) Desert #2 Old (White Sage Gap); (16) Desert #2 New; (17) Heaven's Well; and (18) Tim Spring which is a developed natural spring.

There is one water development project located within the "R65 Expansion" area, Spotted #5. There is no water developments located within the "R77 Expansion" area or the "Creech/Box/R63 Expansion" area.

There are five (5) water developments located within the "Alamo Expansion" area in the East Desert and Sheep mountain ranges: (1) East Pahrnagat #5 (Enclosure); (2) Woody; (3) East Desert #1 (Rug Mountain); (4) East Desert #2 (Saddle Mountain); (5) Desert #4 (Blacktop); and another five (5) developed springs: (1) Sheep Spring; (2) Cabin Spring; (3) Bootleg Spring; (4) White Rock Spring; and (5) Yellow Jacket Spring.

All of the above water developments and spring enhancements require annual visits to inspect, maintain and make any necessary repairs to ensure continued water availability for desert bighorn sheep and to provide for long term sustainability – again, the mission and founding purpose of the DNWR, as well as the other wildlife benefiting from these vital water sources.

The FDB's additional concerns regarding the proposed Military Land Withdrawals include the following:

1. The proposed withdrawal will remove 301,057 acres of public land from public access. This is a large area, on the scale of the largest Wilderness Area designations. Together with the already 2.9 million acres of existing withdrawn lands under the jurisdiction of the USAF, it would rank close to the top 5 largest Wilderness Areas in the country.
2. The proposed withdrawal will close of the primary access road, commonly referred to as the Alamo Road, which is a historic travel route that predates European settlement, to public travel. This road provides the only access to the northern Sheep Range, which has historically been some of the most productive desert bighorn sheep habitat in the world.
3. The proposed withdrawal will close down public access to six (6) bighorn sheep water developments (guzzlers - artificial rain water catchments) that were built with sportsman's conservation dollars and will affect the on-going recurring cost associated with annual inspection, maintenance and repair visits.

4. The proposed withdrawal will remove public access to springs which have historically been maintained for desert bighorn sheep and other wildlife.
5. The proposed withdrawal will restrict access to five highly sought after Nevada Hunting Units (253, 252, 280, 284 and 283). All five of these units are prized desert bighorn sheep hunt units that have historically produced large trophy animals – a necessary component for maintaining the North American Conservation Model on the DNWR.
6. The proposed withdrawal will reduce the number acres open to the public for camping, hiking, backpacking, horseback riding, game bird hunting, trapping and other forms of recreation associated with public lands.

The FDB's interest in these lands is both in the conservation of wild sheep and the safety of the United States national security. We want to ensure the coordination of these interests is maximally efficient and effective. As advocates for multiple use on federal lands we are well aware that not all of those uses can occur on all the same areas at the same time; however, some overlaps are possible and all our modern abilities in both conservation and training should be employed to avoid needless absolute segregation of lands.

The FDB has a long and well-known track record of working cooperatively with the DNWR, the NDOW and the USAF, including the contribution of private funds and volunteer labor to provide additional water sources to desert bighorn sheep and other wildlife, as well as enhancing and maintaining those water sources currently existing on the DNWR and within the NTTR. We are committed to the same approach in successful arrangements for conservation and readiness. Defining the conservation goals of the lands included in the proposed withdrawal must consider NDOW's plans and existing investments in these areas, as well as the mission of the FWS and other relevant federal land agencies to offer objective alternatives and considerations that avoid impacting what remains of the DNWR, and keeping in mind that wildlife should be managed by wildlife professionals and national security should be managed by military professionals.

Sincerely,

Fraternity of the Desert Bighorn



Brett Jefferson
President

The Fraternity of the Desert Bighorn is a 100% volunteer non-profit 501(c)(3) organization based in Las Vegas, Nevada, with members unselfishly dedicated to the welfare and conservation of Nevada's desert bighorn and other wildlife. Founded in 1964 by a handful of concerned advocates at a time when the desert bighorn sheep population in Nevada was at a historic low of less than 2,000 animals, the Fraternity of the Desert Bighorn has worked over the last five decades to recover bighorn sheep populations in Southern Nevada over 10,000 animals.