



December 9, 2016

Nellis Air Force Base
99th Air Base Wing Public Affairs
4430 Grissom Ave., Ste. 107
Nellis AFB, NV 89191

To Whom It May Concern:

On behalf of the Wild Sheep Foundation (WSF), please accept this comment letter concerning the United States Air Force Legislative Environmental Impact Statement for the Nevada Test and Training Range (NTTR) Military Land Withdrawal at Nellis Air Force Base.

The Desert National Wildlife Refuge (DNWR) was created on May 20, 1936 with the primary objective of perpetuating desert bighorn sheep and their habitat. Although the NTTR plays an equally vital but very different role, WSF believes that the primary mission of the DNWR must play a prominent role in the rationale and need for this decision. While we support the missions of both entities, our primary mission is to enhance wild sheep populations, promote scientific wildlife management and educate the public and youth on sustainable use and the conservation benefits of hunting while promoting the interests of the hunter. Along those lines, we believe the implications of the proposed decision on desert bighorn sheep and those who manage and benefit from them, must be clearly defined within the decision. Finally, we believe the primary missions of the U.S. Air Force, DNWR, WSF and other key stakeholders can be effectively achieved by working cooperatively.

The Fraternity of the Desert Bighorn (FDB) is the local leader of privately-funded sheep conservation work on the DNWR. Through cooperative efforts of conservation organizations such as the FDB and other citizen volunteer groups, the DNWR has a long and proven track record of actively managing habitat for desert bighorns and other native wildlife. In addition, DNWR provides important recreational opportunities including camping, hiking, backpacking, horseback riding, off-highway vehicle riding, as well as limited bighorn sheep hunting. We have the same interest in defining this proposed decision in terms of the both the conservation and the military missions.

The overall question of the need for a larger land base for military readiness must be given more detailed consideration in this proposed decision; which is, the NTTR land base consists of approximately 2.9 million acres of federal land that has already been withdrawn from public use and reserved for military use, most recently by the Military Lands Withdrawal Act of 1999. Our concerns relate to additional restricted access that would limit access for wild sheep management and research purposes, and use by the public. The proposed withdrawal would:

1. Remove 301,057 additional acres of public land from access by wildlife managers and the public.

2. Close Alamo Road, which provides the only access to the northern Sheep Range (some of the most productive desert bighorn sheep habitat in the world).
3. Close access to 18 bighorn sheep water developments that were constructed with sportsman's conservation dollars.
4. Remove public access to springs which have historically been maintained for desert bighorn sheep.
5. Eliminate additional recreational opportunity (including further limitations on hunting).

In order to consider fully the trade-offs presented by these closures and removals, the decision documents must specify in greater detail the enhancements to military readiness they are expected to secure. Examining these enhancements in light of their cost to the conservation mission will lead to a more informative range of alternatives than has already been presented in the scoping phase of the decision. We are ready to engage in the development of such alternatives in the same partnership with the Air Force by which we currently coordinate work schedules under the current missions of the DNWR and NTTR.

Thank you for the opportunity to comment. Please contact us at WSF HQ if you have questions or need additional clarification or assistance from WSF. We look forward to inclusion on your stakeholders mailing list, and to hearing from you on this vitally important matter.

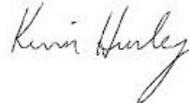
Sincerely,



Gray Thornton
President & CEO



Clay Brewer
Conservation Director



Kevin Hurley
Senior Conservation Director

cc: Brett Jefferson, President, FDB
Jack Atcheson, Jr., WSF Conservation Committee Chair