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Dear [Senator/Representative],

The Nevada Chapter of The Wildlife Society (TWS-NV) understands the U.S. Air Force (USAF) has prepared a Legislative Environmental Impact Statement (LEIS) for expanding the Nevada Test and Training Range (NTTR) to adjoining public lands managed by the U.S. Fish and Wildlife Service (USFWS) and Bureau of Land Management (BLM) for the purpose of keeping optimal pace with technological advances and tactics used in aerial warfare around the globe now and into the future. These additional lands will be used primarily for training new pilots in real-world combat scenarios so they are prepared to defend our country and other countries throughout the world from enemies that would threaten our freedom. We also understand that most of the newly acquired land will be used primarily as a safety buffer from aerial training activities with minimal on-the-ground impact.

While we recognize the importance of this land withdrawal to the security and protection of our nation, we do have some major concerns that we feel should be addressed. The purpose of this letter is to express these concerns which include:

- 1) The programmatic nature of the LEIS, especially the proposed expansion onto the Desert National Wildlife Refuge (DNWR), will result in a significant departure from existing wildlife and land management priorities (i.e., from a wildlife refuge to military training).
- 2) Although current plans are for minimal on-the-ground impacts to occur, there is concern over fencing the new boundary and creating new training infrastructure including but not limited to threat simulators, utility corridors, and access roads and the impacts they will have on wildlife and their habitats and movements.
- 3) Reduced access for wildlife biologists to manage wildlife, especially maintaining existing natural and constructed water sources used by desert bighorn sheep (*Ovis canadensis nelsoni*) and many other species.
- 4) Limited mitigation measures are mentioned and there is concern that the described mitigation measures will not be implemented for wildlife protection.

The biggest concern is due to the significant departure from existing wildlife and land management priorities under USFWS' stewardship as a national wildlife refuge to a management priority as a military training area with alternative 3C. As the largest wildlife refuge in the lower 48 states it is home to over 320 species of birds, 52 species of mammals, nearly 40 species of amphibians and reptiles (including the federally protected desert tortoise), and over 500 species of plants. Originally selected for its

remoteness, ruggedness, and minimal land-use conflicts, the DNWR protects habitat that desert bighorn sheep and other species depend upon, and we, as humans, use and enjoy. The current DNWR boundary is a remnant of the original Desert Game Range created in 1936. The Military Land Withdrawal Act of 1999 withdrew 826,000 acres (approximately one-half) of the DNWR for military use which is currently managed under a shared agreement between the USAF and USFWS, with primary jurisdiction under the authority of the USFWS. Alternative 3C would take an additional 227,000 acres from DNWR and place primary jurisdiction for these lands plus the 826,000 acres from the 1999 withdrawal (Total 1,053,000 acres) under USAF leaving USFWS virtually no say or voice in the management of these lands. This would reduce the DNWR to about 600,000 acres from its original size of 1.6 million acres when established in 1936.

While we recognize the intent is for minimal on-the-ground impacts to occur in all newly withdrawn lands, there may still be impacts from fencing the new boundary; installing new infrastructure such as threat simulators, maintenance buildings, and utility corridors (i.e., power distribution lines); and creating new access roads. These activities may have negative impacts on wildlife including habitat destruction and fragmentation, restricted movements from fencing, and increased predator subsidization (i.e. raven perches on new infrastructure). We believe these and other potential impacts need to be identified and mitigated to the extent possible through a comprehensive natural resource management and monitoring plan that is developed cooperatively with USAF, USFWS, and Nevada Department of Wildlife (NDOW).

Another major concern is the reduced access and inability to manage wildlife, especially maintaining existing natural and constructed water sources used by desert bighorn sheep (*Ovis canadensis nelsoni*) and many other species. In concert with the original intent of the DNWR, conservation partners have made significant investments of time and resources to improve wildlife resources on the DNWR, both within and outside of the NTTR. Expanded restrictions placed on the DNWR and other withdrawn lands could further complicate and reduce the effectiveness of wildlife conservation on these lands. It is critical that access to maintain and monitor wildlife use at existing natural and constructed water sources (e.g. big game guzzlers) remains open and that wildlife surveys are allowed to be conducted, especially in desert bighorn sheep habitat. Also of concern are springs and wetlands that provide habitat for the Amargosa toad (*Anaxyrus nelsoni*) (state-protected species), Oasis Valley speckled dace (*Rhinichthys osculum ssp.*) (state-protected species) and unidentified springsnails (some of which are currently under review for listing under the Endangered Species Act [ESA]). The continued integrity of and access to these sites is critical for conservation and management of these species. In 2000, a Conservation Agreement and Strategy was completed for Amargosa toad and other species that co-occur with the toad in the Oasis Valley such as the Oasis Valley speckled dace. The Conservation Agreement and Strategy is a concerted effort among stakeholders to expand wildlife conservation opportunities, thus precluding the need to list the Amargosa toad under the ESA. Another Conservation Agreement for springsnails in Nevada and Utah has been written and it is recommended that USAF become a partner and signatory to this agreement. These efforts are only effective if conservative, collaborative management of the habitats these species depend on is maintained and protected.

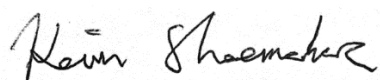
Another concern with the proposed expansion is the lack of any assurances that even the limited mitigation measures mentioned will indeed be incorporated into the final LEIS package presented to Congress. The LEIS analysis for the proposed expansion is dependent on environmental constraints and

mitigation to ensure adverse impacts are below a threshold of significance. Should the existing mitigation measures be adopted into the final documentation as written, they do not specifically require any protections or compensation for reduced or lost wildlife, water, or public access resources. Language such as “consider,” “should,” or “may” conveys little confidence that the described mitigation measures will be implemented. The mitigation section should have been used to convey to the public that the USAF possesses an understanding of sensitive resources and took steps to develop effective mitigation strategies with resource agencies. Without these specifics, there is limited assurance to the public that effective mitigation measures will become a reality if the proposed expansion moves forward.

We recognize that USAF has spent millions of dollars over the last several years managing natural resources including wildlife on the NTTR and summaries of this work can be found in annual reports. NTTR currently has a program to conduct ecological research and monitoring but this program should be expanded with additional staff and funding if the land withdrawals are approved. USAF has been instrumental in mountain lion (*Puma concolor*) and desert bighorn sheep studies across the NTTR, on DNWR, and on the Nevada National Security Site (NNSS) from which valuable information has been obtained about their movements, disease prevalence and metapopulation structure. While some areas have been heavily impacted, the vast majority (millions of acres) are still in pristine condition, having been protected from public access and resource extraction for decades. These undisturbed areas are for all intents and purposes a wildlife refuge and contain some of the most intact and pristine ecosystems in southern Nevada. USAF has also provided limited desert bighorn sheep hunting opportunities on the NTTR.

In summary, while we recognize the need for the USAF to acquire additional lands for military training purposes, we do not support Alternative 3C as currently written due to the large reduction of the DNWR and lack of USFWS management authority of these areas. If Alternative 3C is approved, we strongly recommend that a thorough review be conducted to identify and mitigate to the extent possible all potential impacts through a comprehensive natural resource management and monitoring plan that is developed cooperatively with USAF, USFWS, and Nevada Department of Wildlife (NDOW). We recommend this same strategy if any of the alternatives are chosen to ensure that wildlife and their habitats are conserved and protected as much as possible.

Sincerely,

A handwritten signature in black ink that reads "Kevin Shoemaker". The signature is written in a cursive, slightly slanted style.

Kevin Shoemaker, Ph.D.

President, Nevada Chapter of The Wildlife Society

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