

**Non-Profit Tax Exempt
ID 88-0180276**

**NEVADA BIGHORNS
UNLIMITED**



**P.O. Box 21393
Reno, Nevada 89515-1393
Phone & Fax
(775) 323-1177
www.nevadabighorns.org**

November 15, 2016

Naval Facilities Engineering
Command Southwest
Code EV21AK
1220 Pacific Highway
Building 1, 5th Floor
San Diego, CA 92132

RE: Fallon Range Training Complex Modernization Environmental Impact Statement

Dear U.S. Navy:

Nevada Bighorns Unlimited - Reno (NBU) is a sportsmen's group concerned with the conservation of bighorn sheep as well as other issues impacting various wildlife species throughout Nevada. Our membership represents the largest single chapter of sportsmen and women in the state of Nevada with over 3,400 members. We ask that you strongly consider these scoping comments during the development of the Fallon Range Training Complex Modernization Environmental Impact Statement (FRTC Modernization EIS).

Upon review of the proposed withdrawal of over 605,000 acres of public land, major wildlife concerns with B-17, B-20 and the Dixie Valley Training Area were raised. Additional concerns were raised relating to the proposed modification of airspace within northern and central Nevada. Although the B-16 and B-19 areas will also have negative impacts to wildlife, NBU only has minor concerns with these areas in comparison to the others. The withdrawal areas of greatest concern to NBU and the proposed modifications to airspace are discussed individually below.

B-17 AREA

Our concerns with this area relate to big game, small game, and other avian species and their habitat. Please see the narratives below and the attached Figure 1 for areas of primary concern associated with B-17.

Big Game - Bighorn sheep herds that occur within this area are managed as part of Nevada Department of Wildlife (NDOW) Management Unit 181, which has a population estimated at 380 animals. It's important to note that bighorn sheep are a special status species listed on the Bureau of Land Management's Sensitive Species list statewide. A total of 10 big game water developments occur within the area proposed for withdrawal. In addition to mule deer and pronghorn antelope tags within this area, a total of 16 desert bighorn sheep tags may be

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adversely impacted by the withdrawal proposed in this area. These tags not only provide once in lifetime recreational opportunities to Nevada's sportsmen and women as well as non-residents, but substantial economic gain is provided to Churchill County and Nevada as a result of these tags. Over the past 30 years, sportsmen, conservationists, and various government agencies have worked tirelessly to develop this into a thriving herd that is now one of the most sought after to hunt by sportsmen and women.

Also note that the Bell Mountain and Bell Flat areas provide important habitat for over 200 pronghorn antelope and that these areas are also of concern for NBU.

Small Game and Other Avian Species – The proposed withdraw area associated with B-17 overlaps numerous areas of occupied chukar habitat, which also provides significant recreational opportunities to Nevada's sportsmen and women. Additionally, a total of 23 small game water developments occur within the proposed withdraw area. In addition to avian game species, golden eagles should be considered, as they are federally protected under the Bald and Golden Eagle Protection Act. Reviews of existing data show that at least nine golden eagle nest sites occur within the proposed withdraw area and these sites have significant potential for negative impacts as a result of the proposed withdrawal.

We request that the U.S. Navy remove the Monte Cristo Mountains, Fissure Ridge, the Black Hills, Bell Mountain, and Bell Flat from the proposed B-17 Area. We also request that the expansion area not be extended any further into its existing footprint on Fairview Mountain, Slate Mountain and within the Sand Springs Range. We request that public access continue to be allowed, without further restrictions, into these omitted mountain ranges via State Route 829 in Dixie Valley.

DIXIE VALLEY TRAINING AREA

Our concerns with this area relate to big game, small game, and other avian species and their habitat. Please see Figure 1 for areas of primary concern associated with the Dixie Valley Training Area. Please note that although this area has been identified as "open to the public", we have concerns that this may not remain open in perpetuity. The definition of "open to the public" has not been provided and the duration has not been identified. As such, we have reviewed the impacts based on a worst case scenario. However, it should be noted that even if these areas remain open, there will still be negative impacts to the resources outlined below and shown within Figure 1.

Big Game - This area overlaps NDOW Management Units 182 and 183, which have bighorn populations estimated at 340 and 320 animals, respectively. Additionally, a total of four big game water developments occur within the area that would be impacted by the proposed withdrawal. It's also important to note that these areas provide significant recreational opportunities, including, but not limited to, big game hunting. In addition to mule deer and pronghorn tags within this area, a total of 25 desert bighorn sheep tags may be negatively impacted by the proposed withdrawal in this area. Significant concerns exist specific to impacts to bighorn sheep lambing as well as impacts to hunters.

Small Game and Other Avian Species – The proposed withdrawal area associated with the Dixie Valley Training Area overlaps numerous areas of occupied chukar habitat, which also provides

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significant recreational opportunities to Nevada's sportsmen and women. Additionally, a total of 25 small game water developments occur within the proposed withdrawal area. In addition to avian game species, golden eagles should be considered as they are federally protected under the Bald and Golden Eagle Protection Act. Reviews of existing data show that at least 17 golden eagle nest sites occur within the proposed withdraw area and these sites have significant potential for negative impacts associated with the proposed withdrawal. Concerns also exist relating to impacts to chukar and the sportsmen and women that hunt in addition to the impacts aforementioned to nesting golden eagles.

We request that the U.S. Navy remove the Stillwater Range and the Clan Alpine Mountains from the Dixie Valley Training Area, with the exception of that portion of the existing Navy training area. We also request that public access be allowed, without further restrictions, into these omitted mountain ranges via the Dixie Valley Road.

B-20 AREA

The primary concern with this withdrawal area is its proximity to the Stillwater National Wildlife Refuge, the Fallon National Wildlife Refuge, and specifically those impacts to migratory bird species (Figure 1).

The wetland complex associated with the Stillwater National Wildlife Refuge is Nevada's largest. The Stillwater Marsh area has been a historic stopover point for migratory waterfowl during their spring and fall migration as well as an important nesting site for many waterfowl, marsh, and shorebirds. Peak numbers of 250,000 ducks, 10,000 geese, and 13,000 tundra swans occur during good water years (USFWS, 1985). This wetland complex has been documented and cited in numerous pieces of literature, including but not limited to Garone (1961), Reisner and Bates (1990), and USFWS (1985), as a critically important production area and migratory stopover along the Pacific Flyway. Significant concerns exist associated with interrupting the migration corridor leading to and from this wetland complex, negative impacts upon the birds using this area as a stopover as well as negative impacts upon those birds using this area for nesting purposes.

This area also serves as an important area for recreationists such as bird watchers and waterfowl hunters. Great concern exists specific to potential negative impacts upon these individuals utilizing this area.

Reviews of existing data show that at least three golden eagle nest sites occur within the proposed withdrawal area and these sites have significant potential for negative impacts.

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We request that the U.S. Navy shift the southern portion of this area at least several miles north of the Stillwater National Wildlife Refuge and that the West Humboldt Range be removed from this area.

B-16 & B-19 AREAS

The proposed withdrawal area associated with the B-16 Area overlaps areas of occupied chukar habitat, which provides recreational opportunities to Nevada's sportsmen and women.

MODIFICATIONS TO AIRSPACE

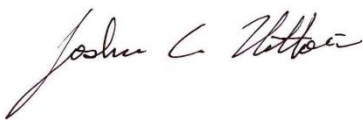
We have concerns regarding the proposed expansion of special use air space and the reconfiguration of existing airspace throughout northern Nevada and especially the flight deck at which training operations will take place. The potential for adverse impacts to species such as greater sage-grouse and bighorn sheep exist associated with training activities close to the ground. Specifically, impacts to bighorn sheep breeding and lambing as well as greater sage-grouse breeding and nesting could be detrimental.

We request that analysis by a qualified wildlife biologist and specialists in acoustics be included within the FRTC Modernization EIS so a minimum flight deck for air operations can developed that does not negatively impact wildlife species.

Overall, upwards of 1,000 bighorn sheep have potential for adverse impacts associated with the various withdrawal areas, which represents almost 10% of Nevada's total population. A total of 43 desert bighorn sheep ram tags have potential for impacts, representing nearly 14% of Nevada's total number of tags statewide. Additionally, NDOW and Nevada's sportsmen have cumulatively invested millions of dollars and tens of thousands of man hours into the 62 water developments on public land that will be withdrawn by the Proposed Action. These investments must not be thrown away. The water developments are invaluable to the success of Nevada's wildlife, have uplifted wildlife habitat, and increased populations, while at the same time, creating areas that are irreplaceable. Wildlife managers along with sportsmen must be allowed full access (at all times) to these water developments, the surrounding habitat, and the associated wildlife in perpetuity. The loss of these water developments or further limitations to public access in this region would be the permanent loss of prime areas for wildlife and hunting.

NBU strongly supports multiple use management on our public lands. We also support the U.S. Navy and look forward to seeing alternatives developed that allow a reasonable solution to the FRTC's training needs while also allowing Nevada's wildlife and sportsmen the right to utilize our public lands resources.

Sincerely,



Joshua C. Vittori - President
Nevada Bighorns Unlimited

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References

Garone, Philip. 1961. The Fall and Rise of the Wetlands of California's Great Central Valley. University of California Press. Berkeley and Los Angeles, California. 1961.

Reisner, Marc and Sarah F. Bates. 1990. Overtapped Oasis: Reform Or Revolution for Western Water. Foreward by Bruce Babbit. Island Press. Covelo, California and Washington, D.C. 1990.

U.S. Fish and Wildlife Service (USFWS). 1985. Stillwater Wildlife Management Area Including Stillwater National Wildlife Refuge Annual Narrative Report for calendar year 1985. Fallon, Nevada.

