

January 28, 2020

Archery Trade Association * Association of Fish and Wildlife Agencies * Boone and Crockett Club * Camp Fire Club of America * Congressional Sportsmen's Foundation * Conservation Force * Council to Advance Hunting and the Shooting Sports * Dallas Safari Club * Delta Waterfowl Foundation * Fraternity for the Desert Bighorn * Houston Safari Club * Masters of Foxhounds Association * National Association of Forest Service Retirees * National Shooting Sports Foundation * National Wildlife Refuge Association * Nevada Bighorns Unlimited * North American Grouse Partnership * Northern Nevada SCI * Orion: The Hunter's Institute * Pope and Young Club * Quality Deer Management Association * Rocky Mountain Elk Foundation * Safari Club International * Sportsmen's Alliance * Wild Sheep Foundation * Wildlife Forever * Wildlife Management Institute

The Honorable Robert Wallace
Assistant Secretary for Fish, Wildlife, and Parks
Department of the Interior
1849 C. St. NW
Washington, DC 20240

Dear Assistant Secretary Wallace:

Our wildlife conservation groups are seeking a substantive discussion with you – and, with your help, engagement by the Air Force – on the proposed expansion of the Nevada Test and Training Range (NTTR) into the Desert National Wildlife Refuge (DNWR). Unless the proposal can be improved by inclusive discussions among all concerned, we cannot support it. Any change to the existing withdrawal must be limited to the minimum necessary terms that accomplish a true military need. Our attempts to engage the Air Force directly have not been reciprocated.

The current proposal would result in the largest loss to the Refuge System in history. The proposal would take jurisdiction for the area away from the Fish and Wildlife Service.

There is an alternative proposal in the Senate (S. 3145) that would postpone inclusive collaboration until after the withdrawal is expanded. That would be too late and would authorize an expansion before anyone knows it is necessary. The size of any expansion should be worked out based on demonstrated needs. The provisions in S. 3145 insisting on co-management and public involvement merely restate terms of the original withdrawal that have been ignored regarding co-management, dispute resolution and access.

DNWR supports hunting and habitat for desert bighorn sheep. Access for both purposes will be reduced, lost, and further complicated if the proposed expansion proceeds. Even under the current withdrawal of half of the area of DNWR, established in FY2000, access is very difficult, conservation work is needlessly hindered, and basic commitments to cooperative management between the Departments of Defense and Interior have not been kept. This is contrary to the terms of the original withdrawal, which maintained primary jurisdiction for the Service and directed cooperative management with the Air Force. The disregard for the intended arrangement also

limits the State of Nevada's ability to manage state trust species. A written agreement on coordination that was required by the original withdrawal has never been reached and this continues to limit on the ground conservation work and challenge all parties.

Our strong support for military readiness has been demonstrated over years of successful coordination with DOD under the Sikes Act which provides for Integrated Natural Resource Management Plans on military installations. Proven mutual benefits of conservation on bases include hunting opportunities for servicemen and women, safety on training areas, and, of course, healthy wildlife populations and habitats on a large acreage of Federal land across the country.

Successful conservation on military lands is the result of careful consideration of evolving needs for the armed services and wildlife and inclusive deliberation of all interests. We are asking for the same effort here. The issues should be defined, discussed, and decided before withdrawing more of the Desert National Wildlife Refuge to military use. Transfer of DNWR to military authority should be rejected entirely.

Established in 1936 for the purpose of wild sheep conservation, and encompassing nearly 1.6 million acres, the DNWR supports desert bighorn sheep and a variety of birds, mammals, reptiles, and amphibians. It is the best remaining example of undisturbed Mojave Desert ecosystem in the West.

Since the year 2000, the nearby Nellis Air Force Base has controlled 826,000 acres of the DNWR – approximately 50% of the entire refuge. The withdrawal removed these acres from public use and put them under an intended co-management agreement with the U.S. Fish and Wildlife Service that has not worked nor been faithfully pursued. The expansion now proposed would increase the land occupied to nearly 70% of the Refuge and dispense with the co-management approach, installing the Air Force as the management authority. These lands would no longer be Refuge lands and lost from the Refuge System. This will further reduce hunting and habitat-management.

We ask that the Department insist on a commitment by the Air Force to fulfill the requirements of the original withdrawal, abandon the idea of assumed jurisdiction, actively incorporate stakeholder suggestions, and find real solutions to co-managing withdrawn portions of the DNWR in conjunction with the Fish and Wildlife Service, the State of Nevada, key stakeholders, and the public. This will ensure an effective and appropriate scheduling for military training, refuge management, and public access on the DNWR. This would incorporate into readiness the sustainability of bighorn sheep populations, water developments, habitat management activities, and hunting and other forms of recreation.

Thank you for your consideration.