



Office of the
CHURCHILL COUNTY COMMISSIONERS

*Carl Erquiaga
Pete Olsen
Bus Scharmann*

February 6, 2020

The Honorable Catherine Cortez Masto
516 Hart Senate Office Building
Washington, DC 20510

The Honorable Jacky Rosen
144 Russell Senate Office Building
Washington, DC 20510

The Honorable Mark Amodei
104 Cannon House Office Building
Washington, DC 20515

The Honorable Steven Horsford
1330 Longworth House Office Building
Washington, DC 20515

Governor Steve Sisolak
State Capitol Building
101 North Carson Street
Carson City, NV 89701

RE: *Churchill County and City of Fallon Position on the Navy's Proposed Fallon Range Training Complex (FRTC) Modernization Project as Described in the Final Environmental Impact Statement and Request for Congressional Support with the upcoming Legislative Process*

Dear Senator Cortez Masto, Senator Rosen, Mr. Amodei, Mr. Horsford, and Governor Sisolak:

Churchill County, Nevada (County) and the City of Fallon (City) are the proud home of Naval Air Station Fallon and we maintain our support for the Navy's mission here and abroad. As a formal Cooperating Agency, the County has been extensively engaged in the Fallon Range Training Complex Modernization Project (FRTC Modernization) Environmental Impact Statement (EIS) process since it began. The County's interest in this high level of participation was to ensure that the Navy can continue to operate and train, while, at the same time, minimizing and mitigating the impacts of the proposed range expansion on our customs, culture and economy for this and future generations. Throughout the process, the County and City have coordinated on their shared interest in seeing the project move forward in a manner that addresses our shared interests and concerns.

We would like to thank you and your staff for your continued attention and engagement with this project, in addition to helping facilitate direct conversations with the Navy. We would also like to thank Governor Sisolak for advancing the Nevada Consolidated Proposal, which we believe is consistent with many of the items contained herein. The County still supports the Nevada Consolidated Proposal and looks forward to our continued engagement with the state and local work groups.

We would like to thank the Navy for holding a public meeting in Fallon following the release of the Final EIS in order to receive direct input from local citizens and stakeholders. Attendance and interest at the January 28, 2020 meeting is just a small example of the input that has been received throughout this process. We would also like to thank the Navy for its efforts in seeking resolutions to our outstanding concerns throughout the NEPA process. We acknowledge further improvements to the Navy's proposal, but still have significant remaining concerns with the Final EIS and Proposed FRTC Modernization as

documented in this letter and attachments. As such, we are respectfully requesting your support in resolving these remaining concerns through the Legislative process.

The County has provided extensive comments, incorporated herein by reference, throughout the National Environmental Policy Act (NEPA) process, including but not limited to:

- Formal scoping comments to the Navy's original FRTC Modernization Proposal;
- Cooperating Agency comments to the Navy's Administrative Draft Environmental Impact Statement (EIS);
- Formal comments to the Navy's Draft EIS;
- Cooperating Agency comments to the Navy's Administrative Final EIS, Version 2; and,
- This comment, which has been copied to the Navy for their consideration prior to signing their Record of Decision.

These above-listed comments have been coupled with our communications with your office, as well as full engagement as a Cooperating Agency in the NEPA Process. This includes County participation in hundreds of hours of meetings with Navy officials and other cooperating agencies. The purpose of this engagement has been to try to improve the Navy's project by identifying concerns raised by our staff, citizens and stakeholders; offering proactive solutions to address those concerns; and, seeking to improve the clarity and accuracy of the Navy's EIS. Our goal was to arrive at a proposal offered in the Final EIS that the County could support and advocate for throughout the subsequent Legislative process. While we acknowledge and appreciate improvements between the Navy's original proposal and the Final EIS, Alternative 3, we cannot offer support of the Navy's Preferred Alternative. The balance of this correspondence is intended to articulate, as clearly as possible, what the County and City could support in the form of a Legislative proposal for the FRTC Modernization and an associated Churchill County Lands Bill.

Final EIS Comments: Based on our review of the Final EIS, we remain opposed to the No Action Alternative, as well as Alternatives 1 and 2. While Alternative 3 (Preferred Alternative) is the most favorable of the proposed alternatives, we do NOT support Alternative 3 as described in the Final EIS. This opposition is based on a host of remaining unresolved concerns that have been documented in this and in previous County comments to the Navy. To date, these concerns have either not been adequately represented in the Final EIS or not addressed in a manner that meets our desired level of resolution. We have attached a list of our most significant *Concerns, Errors and Omissions with the FRTC Modernization Final EIS*. We realize that some of these unresolved items may be addressed in the Navy's Record of Decision and, as such, we plan to review this document and reserve the right to amend our positions, as appropriate.

Proposed FRTC Modernization: The below items represent our proposed changes to the Navy's Preferred Alternative (3) as described in the Final EIS. These items have been mapped and are included in the attached map entitled *Churchill County Proposed Fallon Range Training Complex Modernization and Lands Bill*. We realize that this proposal may not meet the Navy's full request for training expansion; however, the proposed changes still provide a significant improvement in training capacity, while minimizing some, not all, of the significant impacts identified and articulated by us throughout the NEPA process. We have also pointed out areas that appear to have been resolved through the NEPA process, provided they are clearly articulated in the Navy's signed ROD and/or final Legislative authorization, as appropriate.

Bravo 16: We would support expansion of the Bravo 16 Range as described in Alternative 3 of the Final EIS provided that the final Congressional approval includes the following modifications (see attached map):

1. Avoiding the West-Wide Energy corridor, existing power transmission line and existing access road along the western edge of the withdrawal area.
2. Adjusting the northern and northwest corner of the proposed weapons danger zone to accommodate a re-route of Sand Canyon / Red Mountain Road around the north perimeter and northwest corner of the withdrawal area, at the Navy's expense. The road would be constructed to match the existing condition of Sand Canyon Road and located in a perpetual right-of-way dedicated to Churchill County. The re-route would utilize existing roads and trails to the greatest extent possible in order to minimize new disturbance and would also provide administrative and emergency access and serve as fuel break between the B-16 Range and public / private lands immediately north of the Range. The County would assume future management and maintenance of the road.
 - a. We have identified two routes (a preferred option and an alternative) for the re-route of Red Mountain Road (see attached map).
3. Relinquishing to the Department of Interior three sections of existing Navy withdrawn land located in the northeast corner of B-16 for the purpose of future transportation (Nevada Department of Transportation's alignment for the Interstate 11 corridor) and utility corridors without imposing on adjacent residential neighborhoods.
4. Requiring the Navy to allow quarterly chaperoned public visits to the Salt Cave, an important cultural site. This requirement would be in addition to offering tribal visits and an allowance for scheduled special events, such as OHV races.

We appreciate the following Navy commitments in the Final EIS and support the following inclusions in the Navy ROD and Congressional Approval:

1. Avoiding Simpson Road (southeast corner) by modifying its proposed expansion and proposing relinquishment of its existing expansion under and south of the Road.
2. Allowing for continued flood mitigation and emergency spill of flood waters into and across B-16.
3. Reconstructing Lone Tree Road at the Navy's expense to safely accommodate the Navy's use of this road through a rural residential neighborhood.
4. Allowing access for academic, cultural and special scheduled events such as off-highway vehicle races.

Bravo 17: We would support expansion of the Bravo 17 Range as described in Alternative 3 of the Final EIS provided that the final Congressional approval includes the following modifications (see attached map):

1. Reducing the withdrawal area to match the Weapons Danger Zone. This is especially critical in the areas around Bell Mountain to accommodate public access and mineral development.
 - a. See attached map for proximity of Bell Mountain mineral claims in relation to the proposed withdrawal area.
2. Ensuring that biologically sensitive areas identified by the Nevada Department of Wildlife are avoided in terms of target placement and future training activities.
 - a. This map is included in Appendix D, Page D-11 of the Final EIS.
3. Ensuring that roads identified by the County as qualifying for RS 2477 designation are available for the Controlled Access Hunt Program and any other access for special events and visits.

We appreciate the following Navy commitments in the Final EIS and support the following inclusions in the Navy ROD and Congressional Approval:

1. Avoiding State Route 839, which is the County's preferred alignment for the Interstate 11 corridor.
2. Avoiding Earthquake Fault and Fairview Peak Roads.
3. Re-routing State Route 361, at the Navy's expense, prior to closure of the existing alignment.
4. Committing to a minimum 15-day Controlled Access Hunt Program, as well as access for academic, cultural, and special scheduled events such as off-highway vehicle races.

Bravo 20: We would support expansion of the Bravo 20 Range as described in Alternative 3 of the Final EIS provided that the final Congressional approval includes the following modifications (see attached map):

1. Avoiding Pole Line Road.
 - a. The County previously offered to work with the Navy on the realignment of Pole Line Road in a manner that provides similar access points to US Highway 95 in Churchill County and Coal Canyon Road in Pershing County. However, the Navy has not been willing to entertain a realignment that reduces its proposed Weapons Danger Zone, and such a requirement does not allow for a viable transportation corridor. The County would remain open to supporting a realignment similar to that contained in the Nevada Consolidated Proposal Map dated October 15, 2019.
2. Avoiding the Fallon National Wildlife Refuge.

We appreciate the following Navy commitments in the Final EIS and support the following inclusions in the Navy ROD and Congressional Approval:

1. Avoiding East County Road (eastern boundary) by modifying its proposed expansion under and east of the Road.
2. Avoiding the Stillwater National Wildlife Refuge.

Dixie Valley Training Area: While the Navy stated at the January 30, 2020 stakeholder meeting that decisions regarding the Dixie Valley Training Area were still fluid, and we continue to welcome constructive engagement on the future of this critical area, it is important to note that we do not support expanding the Dixie Valley Training Area through a military withdrawal and/or reservation. Rather, we support Congressional designation of the Dixie Valley Special Management Area (DVSMA), which would include the following:

1. The DVSMA would continue to be managed by the Department of Interior's Bureau of Land Management for multiple use management under the Federal Public Land Management Act. Wildlife management authority would remain with the State of Nevada, through its Nevada Department of Wildlife, except for those species managed under the Endangered Species Act by the US Fish and Wildlife Service.
2. The DVSMA would be withdrawn from the General Mining Act of 1872, thereby prohibiting location and development of locatable minerals.
3. Provided they avoid important biological and cultural resources, the DVSMA would permit Navy training activities and infrastructure described in the Final EIS without the need for a BLM casual use analysis, including:
 - a. Installation of permanent aircraft threat emitters and two electronic warfare training sites.

- b. Temporary aircraft threat emitters.
 - c. Ground training and convoy training that utilizes existing roads.
 - d. Aircraft training, which would include a flight floor of 50' above ground level, except for that area designated as a flight sanctuary area (bound to the north by the boundary of the DVSMA, to the east by the Clan Alpine Wilderness Area, south by existing power transmission line, and west by existing power transmission line.)
4. The DVSMA would prohibit the following land uses:
- a. Any temporary or permanent structures over 40' in height, or any temporary or permanent land use authorization that would interfere with Navy night vision, communications, and electronic warfare training as determined by the Navy in consultation with the BLM and project proponent.
 - b. Within the flight sanctuary area, all land use authorizations would be prohibited unless associated with grazing, water rights, or public access. No temporary or permanent structures would be allowed in excess of 10' in height without prior authorization.
5. The DVSMA would explicitly permit the following land uses and authorizations:
- a. Public access and recreation would not be closed or curtailed in any manner. Recreation would continue to be managed by the BLM.
 - b. Grazing would not be closed or curtailed in any manner. Grazing would continue to be managed by the BLM.
 - c. Churchill County's Dixie Valley Water Project, which must comply with the above-listed prohibitions (i.e. height limitations). Churchill County was encouraged by positive comments from the Navy at the meeting on January 30 where the Navy noted its openness to compensation to the County related to any additional required design features, such as underground transmission lines, that could be imposed by the Navy.
 - d. Geothermal exploration and development, as managed by the BLM in coordination with the Navy, west of State Route 121 with no change in laws or regulations dictating project implementation and disposition of proceeds to state and local government.
 - e. Exploration and development, as managed by the BLM in coordination with the Navy, of salable minerals or other fluid or leasable minerals in coordination with the Navy.
 - f. All existing roads identified by Churchill County as RS 2477 Roads shall be granted perpetual rights-of-way by the BLM.
 - g. Utility rights-of-way to accommodate future development (Churchill County previously suggested 1-mile wide) would be permitted immediately west of the existing north-south power line along SR 121 and immediately north of US Highway 50.

Also, as relates to Dixie Valley, the Navy should not purchase any private property where landowners are not willing sellers, such as with Bench Creek Ranch.

Special Land Management Overlay (SLMO): We support implementation of the SLMO south of Highway 50 as proposed in the Final EIS provided the Navy's ROD and/or final Legislative authorization clearly defines the stipulations described in the Final EIS (i.e. lands remain open to public access and under management authority of the BLM).

Other Key Provisions: The following provisions are applicable to all proposed FRTC expansion areas:

- Provide appropriate compensation for all private property (including water and mineral rights) affected by the Navy, see funding authorizations below.

- Mitigate and/or compensate grazing permittees for any permanent losses, including permanent loss of grazing permits issued by the BLM and any real property, see funding authorizations below.
- Minimize withdrawal areas to the greatest possible extent, particularly around the Bravo Ranges to minimize access and multiple use management to the greatest degree.
- Include County and City representation in any work groups or oversight committees responsible for FRTC Modernization implementation.
- The Navy must increase its operational capacity, budget, and coordination with federal, state and local agencies in order to improve its wildland fire fighting and management (pre-suppression and restoration efforts) commensurate with its proposed expansion and additional training capabilities.

Churchill County Proposed Lands Bill: The below components are directly related to FRTC Modernization Project either by the direct geographic nexus / proximity to the proposed expansion and/or by the ability of these provisions to mitigate remaining residual impacts to our customs, culture, and economy. We understand this is the beginning of a dynamic Legislative process, and we reserve the right to amend this proposal as warranted per stakeholder feedback and ever-evolving information.

Conservation Provisions: The following conservation provisions would be included (see map):

1. Designation of the Grimes Point and Stillwater Range National Conservation Areas coupled with release of the Stillwater Mountains and Job Peak Wilderness Study Areas.
2. Designation of the Clan Alpine, Desatoya (Churchill County portion), and Augusta Mountains (Churchill County portion) Wilderness Areas coupled with release of the Clan Alpine Mountains, Desatoya Mountains (Churchill County portion) and Augusta Mountains (Churchill County portion) Wilderness Study Areas.
3. See below section on funding authorizations that would support conservation programs.

Economic Development and Land Use Provisions: The following economic development provisions would be included (see map):

1. A checkerboard resolution area would be designated and a process to consolidate private and public lands as would be established. The process for consolidating private and public lands would include input from the County, City, appropriate federal and state entities, as well as interested stakeholders.
2. Public lands surrounding the existing City of Fallon landfill would be conveyed to the City of Fallon as a public purpose conveyance for future operations and expansion of the landfill.
3. FRTC Modernization Mitigation Conveyances, as shown on the attached map, would be conveyed from the appropriate federal agency to the County in order to offset impacts from the proposed FRTC Modernization. These specific conveyance parcels are either located within the Economic Opportunity Zone or in areas identified by stakeholders directly affected by the FRTC Modernization.

Transportation Provisions: The following transportation provisions would be included (see attached map):

1. The County has identified its preferred Interstate 11 corridor, as well as the Nevada Department of Transportation's preferred corridor (see attached map) through Churchill County. We would ask that these two corridors be Congressionally designated as preliminary rights-of-way, subject

to subsequent NEPA processes as appropriate, and that the FRTC Modernization process does not interfere in any way with either right-of-way.

2. The County has identified its preferred Sand Canyon / Red Mountain Road corridor, as well as an alternative corridor. We would ask that the Navy, at its expense, construct a road in one of these two corridors to maintain a level of public, administrative, and emergency access around the B-16 range. The road would be built to match the current condition of Sand Canyon Road and would be placed in a right-of-way that would be designated to the County in perpetuity with the County assuming maintenance responsibility.

Funding Authorizations: The following funding authorizations would need to be included in order to implement the Navy's proposed modernization, as well as facilitating key mitigations outlined above:

- **Specific to Private Property (Including Land, Mineral Claims, and Water Rights):** Authorize and appropriate funding to compensate all private property owners.
 - **Specific to Water Rights:** Authorize and appropriate funding to compensate all water right holders (including those with claims of vested rights and permits) within the final withdrawal area, unless said rights can be otherwise mitigated.
 - **Specific to Mining and Mineral Resources (including geothermal):** Authorize and appropriate funding to compensate all mining claimants within the proposed withdrawal areas (Bravo Ranges and DVTA).
- **Specific to Grazing:** Authorize and appropriate funding to compensate for any grazing losses to permittees and lease holders for the permanent loss of their grazing permit and/or other real property as well as the remaining balance on any business loan for lease payments. In addition, permittees and lease holders should be given a 3-year tax deferral on the sale of the allotment and any cattle, due to the withdrawal, to allow them to find replacement property.
- **Specific to Ground Transportation:** Authorize and appropriate funding to:
 - Relocate State Route 361 (Gabbs Highway);
 - Rebuild Lone Tree Road;
 - Relocate Sand Canyon / Red Mountain Road (B-16), which must be designed and built to the current condition of Sand Canyon Road; and
 - If difficult decisions regarding Pole Line Road is completely unavoidable, the Navy would relocate, at its expense, to match the current condition of Pole Line Road.
- **Specific to Land Conveyances:** Authorize and appropriate funding for a Dedicated Land Consolidation Fund to facilitate special conveyance and resolution of checkerboard land ownership pattern in Churchill County. These funds would be available for completing required cultural, environmental, and realty actions and documentation to complete conveyance of public lands to non-public owners or vice versa.
- **Specific to Socioeconomics:** Authorize and appropriate funding to a Dedicated Planning Fund with programs similar to those offered through the Office of Economic Adjustment for State and Local Planning and required planning updates due to the FRTC Modernization.

- Appropriate funding to the existing Readiness and Environmental Protection Initiative (REPI) specific to the FRTC area to help offset impacts through cooperative conservation projects (i.e. conservation easements) with private landowners, local governments, and state agencies.
- **Specific to Public Health and Safety:** Authorize and appropriate funding to a Dedicated Wildland Fire Suppression Fund in order to provide for state and local government fire management activities within the FRTC (including Navy-owned and withdrawn lands, as well as private and public lands located under Navy airspace). This would be in addition to the Navy’s internal efforts and improved capacity to manage fire per their own capabilities.
 - Authorize and appropriate funding to a Dedicated Wildland Fire Restoration Fund in order to provide for state and local government post-fire management restoration activities within the FRTC (including Navy-owned and withdrawn lands as well as private and public lands located under Navy airspace).
- **Specific to Recreation:** Authorize and appropriate funding to a Dedicated Recreation Fund to facilitate state and local government directed recreational improvements that mitigate impacts associated with the FRTC Modernization.
- **Specific to Biological Resources:** Authorize and appropriate funding to a Dedicated Wildlife Fund to facilitate State-directed wildlife management that mitigates impacts associated with the FRTC Modernization including the area under Navy air space.
- **Specific to Noise:** Authorize and appropriate funding for a noise study specific to Greater Sage Grouse within the FRTC Modernization.

The County and City continue to believe that the FRTC Modernization Project can be implemented in a manner that meets the Navy’s needs and minimizes impacts to an acceptable degree. To meet this goal, there will need to be a collective effort to ensure the Navy’s Record of Decision and final Legislative Authorization(s) and Appropriation(s) includes further changes to the Navy’s proposal, a Churchill County Lands Bill component and appropriate funding authorizations as outlined above. We understand this will be a dynamic process and both the City and the County stand ready to be part of the solution for this important project. For additional information, please contact County Manager Jim Barbee at (775) 423-5136.

Thank you,



Pete Olsen, Chair
Churchill County Board of Commissioners

Thank you,



Ken Tedford, Mayor
City of Fallon

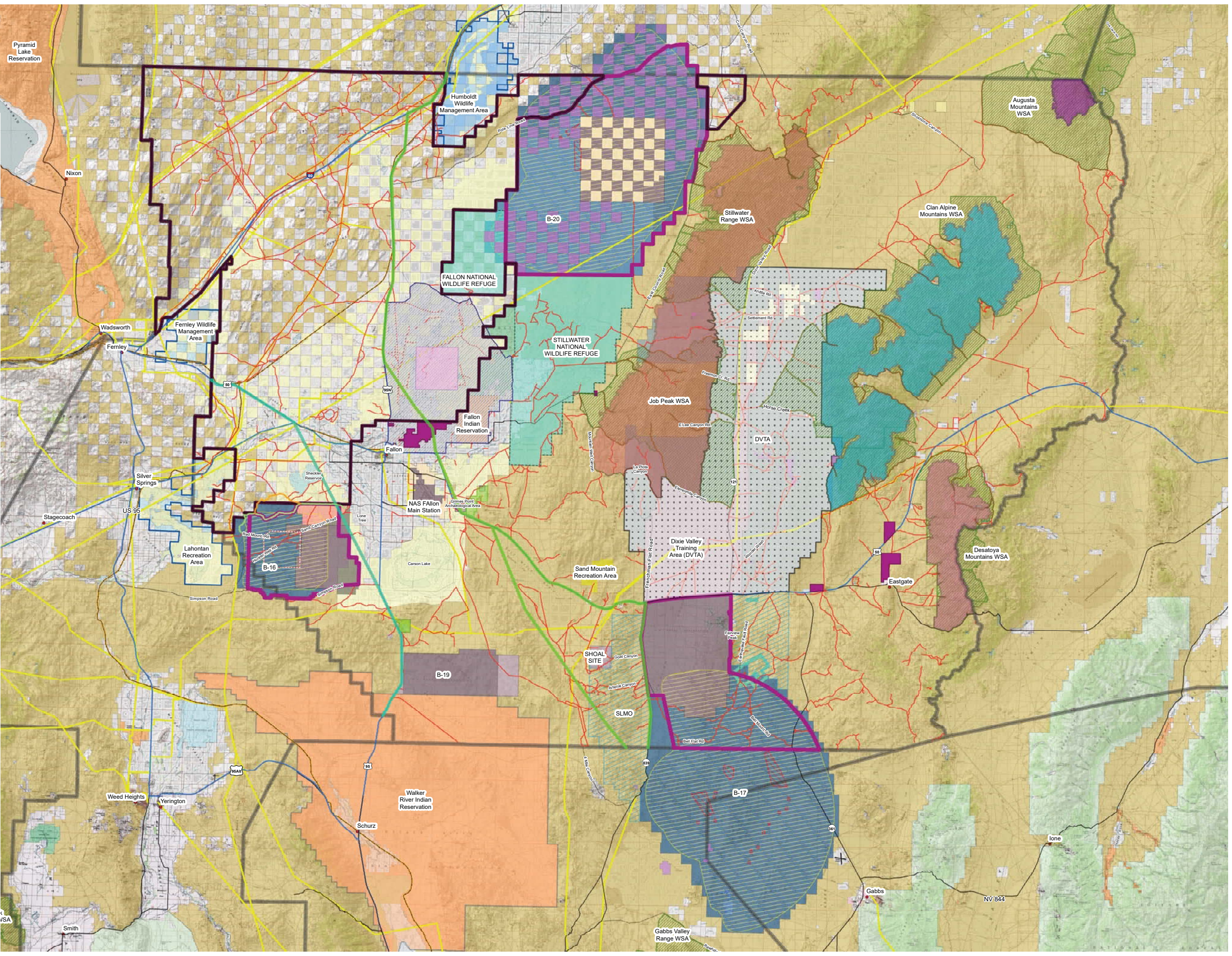
Attachments: Churchill County Proposed Fallon Range Modernization and Lands Bill Map

Concerns, Errors and Omissions with the FRTC Modernization Final EIS

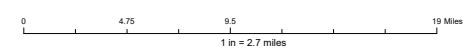
cc:

Congresswoman Dina Titus
Congresswoman Susie Lee
Nevada Consolidated Stakeholders, Care of: Bradley Crowell, Director
Nevada Department of Conservation and Natural Resources
Nevada Association of Counties
The Honorable Lucian Niemeyer, Acting Assistant Secretary of the Navy
(Energy, Installations and Environment)
Mr. James B. Balocki, Deputy Assistant Secretary of the Navy
(Installations and Facilities)
Mr. Todd C. Mellon, Principal Deputy Assistant Secretary of the Navy
(Energy, Installations and Environment)
Mr. James D. Omans, Director of Real Estate, Office of the Assistant Secretary of the
Navy (Installations and Environment)
Captain Evan L. Morrison, Commander, Naval Air Station Fallon
Mr. Alex Stone, Project Manager, FRTC Modernization, Environmental Impact Statement
Ms. Sara Goodwin, SW Regional NEPA Coordinator,
Naval Facilities Engineering Command Southwest, Code EV21.SG
Mr. Jon Raby, Nevada State Director, Bureau of Land Management
Mr. Ken Collum, Field Manager, Stillwater Field Office, Bureau of Land Management
Mr. Carl Lunderstadt, Manager, Stillwater National Wildlife Refuge

- Legend**
- Cities/ Towns
 - County Boundary
 - Railroad
 - Transmission Lines
 - Roads**
 - Highway
 - Major Road
 - County Roads
 - RS2477 Roads
 - Existing Special Designations**
 - Grimes Point Archeological Area
 - State Wildlife Management Area (WMA) or Recreation Area
 - Wilderness Study Areas
 - Bell Mountain Mineral Claims
 - Economic Opportunity Zone
 - Indian Lakes Area
 - Sand Mountain Recreation Area
 - Land Surface Management***
 - Bureau of Reclamation
 - Bureau of Land Management
 - Bureau of Indian Affairs
 - Department of Defense
 - Fish and Wildlife Service
 - Forest Service
 - State of Nevada
 - Existing Navy Withdrawal Areas****
 - Navy Owned Land
 - Withdrawn from BLM (Closed)
 - Withdrawn from BLM (Open)
 - Withdrawn from BLM (Open, Proposed Closed)
 - Proposed Navy Withdrawal Areas****
 - Withdrawal from BLM (Closed)
 - Withdrawal from BLM (Open)
 - Non-Federal Land (Proposed for Navy Purchase)
 - Special Land Management Overlay
 - Weapon Danger Zone
 - Target Areas
 - Immediate Action Drill Ground
 - Maneuver Area and Close Air Support Target Area
 - Churchill County Proposed FRTC Modernization**
 - B-16 (48,632 Acres)
 - B-17 (94,268 Acres, Churchill County Portion)
 - B-20 (189,069 Acres)
 - Dixie Valley Special Management Area (269,572 Acres)
 - Proposed Conservation Designations**
 - Grimes Point NCA
 - Stillwater NCA
 - Clan Alpine Wilderness Area
 - Desatoya Mountains Wilderness Area (Churchill County Portion)
 - Augusta Mountains Wilderness Area (Churchill County Portion)
 - Proposed Economic Development Designations**
 - Checkerboard Resolution Area
 - Public Purpose Conveyances
 - FRTC Modernization Mitigation Conveyances
 - Proposed Transportation Designations**
 - County Preferred Red Mountain Road Realignment
 - County Alternate Red Mountain Road Realignment
 - County Preferred I-11 Corridor (Churchill County Portion)
 - NDOT I-11 Corridor (Churchill County Portion)



Churchill County Proposed Fallon Range Training Complex Modernization and Lands Bill



Date Sources:
©2010 BLM NV Surface Management Layer
©2012 Data Supplied by NHD-Fallon, Draft 018

Churchill County Concerns, Errors and Omissions with the FRTC Modernization Final EIS

General Comments:

The County's concern that specific assurances and mitigation measures have yet to be secured and documented in the FEIS (see below document-specific comments). As a result of this concern, the County has collaborated with other local governments and State of Nevada agencies to develop the Nevada Consolidated Proposal (Proposal). This Proposal captures some of the common concerns and mitigation proposals shared by a broad group of key stakeholders. The County reiterates its support for the Nevada Consolidated Proposal conveyed by Governor Sisolak on October 15, 2019.

Significant errors and omissions in the FEIS document. The below list contains several key errors and omissions found in the Final EIS:

- An example of a significant error: The County was informed that the Bravo 16 Weapons Danger Zone (WDZ) printed in the Draft EIS was incorrect. This is concerning because the County had provided extensive comment as to the WDZ in relation to the proposed withdrawal boundary on multiple occasions. The fact that the error hadn't been noticed or corrected before publication of the Final EIS is of great concern to the County.
- A second example of a significant error: For quite some time the Navy and the County have discussed the mutual desire to avoid any portion of withdrawal that included East County Road. While the text in the document appears to capture this intent, Figure 2-17 shows two sections of land that include East County Road as being withdrawal, but "open to the public". These sorts of errors should not have been included in the Final EIS.
- An example of a significant omission: There is no specific disclosure as to the public land laws that the Navy will request Congress to waive versus those that will remain in effect for the various withdrawal areas associated with the FRTC Modernization (i.e. Bravo Ranges, Dixie Valley Training Area, Special Land Management Overlay, and Shoal Site). This is a critical disclosure because it directly affects how the Navy's actions impact public lands in the County as well as the future viability of important infrastructure such as the disposition of minor County roads / resolution of RS 2477 routes and implementation of the Dixie Valley Water Project.
- A second example of a significant omission: The Final EIS doesn't appear to disclose the location of specific private (non-federal) lands proposed for purchase in the DVTA. This is key because the County specifically requested that the Navy not purchase the Bench Creek Ranch. In its response to comments, the Navy indicates that it has not interest in purchasing the Ranch, but there isn't anything in the Final EIS itself that reflects this assurance.

Late emerging information, particularly on the Dixie Valley Training Area. During the NEPA scoping portion of the project it was unclear as to what land use restrictions would be imposed on the Dixie Valley Training Area (DVTA). While the Draft EIS improved this disclosure and description, there were still a host of unknown land use impacts (i.e. likelihood or feasibility of developing projects such as the Dixie Valley Water Project or future geothermal projects). The FEIS still does not clearly delineate which public land laws will remain in effect nor any firm assurance that access will remain "open" to the public for the full duration of the proposed withdrawal. The FEIS does not commit to allowing critical projects such as development of the Dixie Valley Water Project, which is the primary drinking water supply identified to serve future growth in the County. Without explicit assurances on these matters, the County cannot support expansion or renewal of the DVTA.

Chapter 1: Purpose and Need for the Proposed Action.

Churchill County Concerns, Errors and Omissions with the FRTC Modernization Final EIS

Page 1-2: Given the incomplete analysis offered in the Draft EIS (see Churchill County’s previous comments), and the significant changes made from that document to this document, it seems insufficient to offer the public only 30-days to review the Final EIS before the Navy signs the Record of Decision. Most other EIS processes with this much change would offer a Supplemental Draft EIS and another round of public comment. Given the magnitude of this proposal and the FRTC Modernization the County believes more public comment than is currently being suggested by the Navy is warranted.

Page 1-5, History of the FRTC: Given that Public Law 106-65 doesn’t expire until Nov. 5, 2021, does that afford more time for additional public comment under the NEPA process?

Page 1-10: The discussion regarding the increasing threat of encroaching development around the DVTA seems to imply the need for withdrawal. However, the BLM’s Draft Resource Management Plan took significant steps towards addressing this concern. In addition, the County would have been and continues to be willing to develop County code and ordinances that would prevent conflicts with necessary training without the need to withdraw this land.

Page 1-11: It should be disclosed that this assessment of “real-world constraints” did not include input for key stakeholders including Churchill County, which is large part is why there are so many unresolved concerns at this late date in the process.

The Navy evaluated the identified training capability gaps against the real-world constraints (e.g., regional roadways, commercial airspace, population centers) on meeting all TTP requirements.

Page 1-11: This statement concerns the County in that a potential exists for additional withdrawal or expansion before the 25-year withdrawal requested by this action is up.

The Navy’s Proposed Action to modernize the FRTC would close training capability gaps to tactically acceptable levels but would still not achieve full TTP compliance because that would require land and airspace approximately double what is being requested.

General Comments: The below items represent the outstanding issues that Churchill County has advanced in previous comments that the County believes remain unresolved at this time. These are issues that the County believes the Navy can address without special Congressional authorizations:

Specific to Private Property (Including Land, Mineral Claims and Water Rights): All private landowners within the proposed withdrawal area must be properly notified (i.e. certified mail) and compensated for any and all losses.

Specific to all Bravo Ranges: The Navy should reduce all Bravo Range withdrawal areas to match the proposed Weapons Danger Zone(s) by utilizing the smallest possible sectional breakdown.

Specific to Bravo 16: See cover letter.

Specific to Bravo 17: See cover letter.

Churchill County Concerns, Errors and Omissions with the FRTC Modernization Final EIS

Specific to Bravo 20: See cover letter.

Specific to the Dixie Valley Training Area (DVTA): See County Cover Letter

Specific to the designation of a Special Land Management Overlay (SLMO): See cover letter.

Specific to Mining and Mineral Resources (including geothermal): All mining claimants within the final withdrawal areas must be properly notified and compensated for any and all losses.

Specific to Grazing: The Navy should be working directly with grazing permittees on an allotment by allotment basis to avoid or minimize impacts. For any unavoidable impacts: all public land grazing permittees and lease holders within the final Withdrawal Area (Bravo Ranges) must be fairly compensated for any and all losses, including but not limited to: lost Animal Unit Months; remaining balance on business loan for lease payments; lost range improvements; and, costs associated with pursuing new or revised grazing permits.

Compensation must be for the full term of the Navy withdrawal. Fair compensation should be determined by a private agricultural appraisal process.

Specific to Ground Transportation: The Navy must recognize and honor all existing Federal, State and County rights-of-way including roads that were granted through 43 U.S.C. 932 (R.S. 2477 Roads).

Churchill County has completed an inventory of roads in the County that qualify as R.S. 2477 Roads. This inventory physically mapped these roads, documented their existence, use and maintenance to verify that they would qualify as roads granted to the County Under 43 U.S.C 932. These roads are formally recognized by the County as “minor county roads” and open for public use under the laws of the State of Nevada. These roads were further expressly recognized and preserved for public use through the enactment of the Federal Land Policy Management Act of 1976 (See § 701(a)).

Subsequent analysis indicates that over 100 miles of these RS 2477 qualified roads would be closed by the Navy’s proposed expansion of Bravo Ranges, and over 250 miles would be affected by the Navy’s proposed expansion of the Dixie Valley Training Area.

The County believes, and now has concrete supporting documentation, that these roads qualify as “authorized existing uses” of public lands. The County has not had reason to seek previous adjudication of these roads because they have not previously been proposed for closure. The Navy’s unwillingness to recognize these routes as an authorized existing use, and subsequent lack of proposed mitigation to offset subsequent impacts, is further compounded by the fact that the Navy will be utilizing these very same roads for their training operations at a significant cost savings to the Navy. Furthermore, the lack of information as to the proposed withdrawal stipulations in the DVTA casts doubt on whether the County will be able to move forward with formal adjudication of those roads. This is a major concern to the County and a great impact to

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the County's customs, culture and economy. If the Navy is not willing to allow formal County adjudication of these roads in the DVTA, then the County cannot support the Navy's proposed expansion. The County is willing to share this inventory information and work with the Navy and BLM to seek a favorable solution to this important issue.

The following federal highways must be avoided by the Navy's land withdrawals: US 50 & 95.

The following state highways must be avoided by the Navy's land withdrawals: SR 121 and 839 (currently included in Alternative 3). The Navy must recognize and honor all existing State rights-of-way.

The following county roads must be avoided (currently included in Alternative 3) by the Navy's land withdrawals: Simpson Road (B-16 in Churchill and Lyon Counties), Earthquake Fault, Fairview Peak (B-17 in Churchill County) and Rawhide Road (B-17 in Mineral County) and East County Road (B-20 in Churchill County). The Navy must recognize and honor all existing county rights-of-way, including those roads that would qualify under RS 2477.

The following roads must be avoided or relocated at the Navy's expense:

- Sand Canyon / Red Mountain Road (B-16 in Churchill County) should be designed and built to match the existing condition of Sand Canyon Road. Final right-of-way for this road should be assigned to the County.
- Pole Line Road (B-20 in Churchill and Pershing Counties) should be avoided or re-routed match current condition of the road. Final right-of-way for this road should be assigned to the County.

The County appreciates the commitment by the Navy to reconstruct Lone Tree Road and SR 361, and is seeking similar commitment for the two roads listed above.

Specific to Airspace: The County specifically questions the proposed R4816 N and R4816 S Low restricted areas that will move the floor to ground level in an area that includes:

- Existing State Route 121 (Dixie Valley Road);
- Existing Power Transmission Lines (both north-south and east-west);
- Allows for continued public access and multiple use; and,
- Is critical to development of the Dixie Valley Water Project.

The County supports improved radio coverage, at Navy's expense, in order to provide uninterrupted radio coverage from Desert Control to the entire Special Use Area as a safety measure.

Specific to Noise: The Navy must fund a research project regarding potential impacts to Greater Sage Grouse within FRTC Modernization Project and commit to Adaptive Management if impacts are found to occur. All efforts must be closely coordinated with the State of Nevada. This issue/concern was identified in the Ninety Days to Combat document and it is unclear why such a study was not included in the NEPA analysis.

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Specific to Water Rights: The Navy must properly and thoroughly identify all water rights and must work with individual water right holders to avoid, minimize or rectify impacts, to all existing rights within the proposed Bravo Range expansions. Any impacts that cannot be avoided should result in compensation for any and all loss. This must include any impacted claims of vested right that have not been adjudicated by the Nevada Division of Water Resources.

Any water rights acquired by the Navy must be relinquished to the State of Nevada, or otherwise appropriated for Navy use per State Water law. Any water rights acquired or held by the Navy will be subject to appropriate State of Nevada fees.

Guaranteed assurances need to be made by the Navy to allow implementation of the Dixie Valley Water Project. This includes, but is not limited to: rights-of-way for wells, pipelines, power lines and other appropriate infrastructure, as well as temporary rights-of-way for construction and access for continued monitoring and study of the aquifer. The County remains concerned with the viability of the project given the proposed “Required Design Features” in particular the increased costs associated with the requirement to bury power and communication lines from the main transmission corridor to well sites.

Specific to Biological Resources: Administrative access by the Nevada Department of Wildlife must be guaranteed in all withdrawal areas and Navy airspace for the full term of the Navy withdrawal. This is necessary in order to continue wildlife management activities, including, but not limited to: monitoring of big game herds, disease surveillance, monitoring and maintenance of water developments, and possible trap and transplant of wildlife species.

The Navy should ensure dedicated funding to offset direct impacts to wildlife, as well as a loss of public access to wildlife resources within the proposed Bravo Ranges.

Specific to Cultural Resources: Target placement in Bravo Ranges must avoid culturally sensitive areas and facilitate managed access to such sites. The Navy must properly and thoroughly identify all traditional cultural properties and commit to managed access to the Bravo Ranges for cultural visits associated for ceremonial, public educational, and research purposes.

Specific to Recreation: The Navy must ensure implementation and fund their operational costs for a guaranteed Managed Access Program for Bravo 17 with a minimum of 15-days of assured access for big game hunting for the full term of the Navy withdrawal. As part of the managed access program, maintain road access (avoid target placement in): Fairview Peak, Bell Canyon (eastern ½), Bell Flat, Slate Mountain and Monte Cristo Mountains (particularly Kaiser Well and wildlife guzzler locations).

Specific to Public Health and Safety: The Navy must work with federal (BLM and US Forest Service), state (Nevada Division of Forestry and NDOW), and local partners (affected counties and fire districts) to develop and implement a robust wildfire management plan that addresses fire prevention, suppression, and rehabilitation.

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The Navy must secure dedicated funding for said implementation and must establish wildland firefighting capability that includes: staffed type 3 engines, hand crews trained to National Wildfire Coordinating Group standards, and helicopters with water buckets.

The Navy must develop fire management agreements with federal wildland firefighting agencies that will facilitate rapid response and initial attack to wildfires occurring within the FRTC. The Navy must stage military firefighting resources for rapid initial attack based on biological values at risk, forecast fire behavior and proximity to likely ignition sources (active bombing areas). The Navy must also use qualified natural resource specialist(s) develop a rehabilitation plan for each wildfire that will guide efforts to repair damage caused by suppression efforts and restore appropriate vegetative cover on the fire-damaged site to promote full recovery.

Maintaining and/or relocating access roads around the Bravo Ranges will provide critical emergency access and fuel breaks around areas that will be subject to very high wildfire ignition potential.

Chapter 2: Description of Proposed Action and Alternatives.

The County does NOT support the No Action Alternative as previously stated for a host of reasons previously documented.

The County does NOT support Alternative 1 as previously stated for a host of reasons previously documented.

The County does NOT support Alternative 2 as previously stated for a host of reasons previously documented.

While Alternative 3 (Preferred Alternative) is the most favorable of the proposed alternatives, the County does NOT support Alternative 3 as described in the Final EIS. This opposition is based on a host of remaining unresolved concerns that have been documented in this and previous County comments to the Navy. Many of those concerns have either not been adequately represented in this document or addressed to the County's expectation. The County remains committed to working towards a favorable resolution of these outstanding concerns but wants to make it clear that it does NOT support the Navy's Preferred Alternative at this time.

Table 2-1, Footnote 1: This footnote suggests that the withdrawal of the DVTA would be similar to the withdrawal of the Bravo Ranges. This table, and the Proposed Action in general, needs to better define exactly which "public land laws" will be withheld from the Bravo Ranges, DVTA, SLMO and Shoal Site. While the Navy clearly articulates throughout the FEIS that it intends to operate the Bravo Ranges differently than the DVTA, SLMO and Shoal Site, there is nothing in the document that specifies which public land laws would remain in affect and which would be withheld from the various training areas. This is a significant omission that needs to be resolved in order for the County, other Cooperating Agencies and public to determine the true impacts of each training area.

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¹*Withdrawn lands are lands withheld from the operation of public land laws for the use or benefit of an agency by reservation, withdrawal, or other restrictions for a special government purpose. The existing withdrawn acreage represents the area currently withdrawn that Navy is requesting for renewal.*

There is nothing in this Chapter that explains the specific mechanisms (public land laws) for how the Bravo Ranges, DVTA, SLMO and Shoal Site will be managed going forward. **Specifically, what public land laws will the Navy recommend to Congress remain in effect and which public land laws will the Navy recommend to Congress for withdrawal from each area? It is of vital importance that this disclosure be made so that the County and other stakeholders clearly understand the Navy’s legislative intent and subsequent impacts of the proposed action.**

At this time, Churchill County cannot support expansion of the DVTA given the uncertainty around which public land laws the Navy will recommend for withdrawal. Without this clarification, the County cannot assess the true probability of ensuring public access (including adjudication of RS 2477 roads) and the process for implementing the Dixie Valley Water Project. **As such, the County recommends that the DVTA expansion be abandoned and the expansion area designated Congressionally as a Special Management Area where public lands remain under the jurisdiction of the BLM and managed in consultation with the Navy (see cover letter).**

Table 2-1: Churchill County has the following suggestions and questions for Table 2-1:

1. The Navy should add the requested additional withdrawal and proposed acquisition acres suggested in the Ninety Days to Combat document as it largely serves as the basis for the proposed action. The Navy should better justify why those acreages have increased.
2. The Navy should explain why the acreage for B-16 and the DVTA increased from DEIS to FEIS and justify the increase.
3. The Navy should add the SLMO area to this table.

Figure 2-5: The County appreciates the clarification that Simpson Road and the area south of Simpson Road is “Withdrawn Lands to be Relinquished”. However, the County once again questions why the boundaries of the withdrawal cannot be further reduced to better match the “Immediate Action Drill Ground Maneuver Area SDZ/WDZ”. The County would re-state its previous comments to reduce the proposed withdrawal areas to avoid various conflicts with existing roads, private lands and power transmission infrastructure and corridors.

Figure 2-6: The County appreciates that the Navy has reduced the proposed withdrawal area to better fit the Weapons Danger Zone, but questions why this reduction wasn’t more extensively applied to the western boundary and northern portion that abuts the existing B-17 withdrawal area, particularly given the conflict with a major mine project (Bell Mountain) that has a high potential for significant socio-economic benefit to the County.

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Figure 2-7: The County continues to oppose the closure of Pole Line Road, which the Navy has labeled as “Navy Range Access Road”. The County also opposes that portion of the withdrawal located within the Fallon NWR.

The County has always opposed the withdrawal including East County Road and has been assured on numerous occasions that it was not the Navy’s intent; however, the map does not reflect that intent. As such, The Map needs to be corrected to reflect that the Proposed Withdrawal does NOT include East County Road nor lands to the east of the road. The text does not reflect that the lands east of the road would be withdrawn but “open to public”.

DVTA Public Access: The Navy needs to do a better job of explaining in this section that the DVTA will remain open for public access for the duration of the withdrawal, and better explain what steps the Navy would need to take if it were to propose limitations or complete restriction of public access in the future. This is a major oversight in a section entitled “Public Accessibility” for an area that is of critical importance for public access.

Figure 2-8: A better map needs to be provided for the Proposed R4816N Low and R 4816S Low Restricted Airspace Areas. This map should include existing infrastructure such as State Route 121 and the multiple power transmission lines. The County questions why the Navy is requesting extending the flight floor to ground level in an area with existing power lines, a State Highway and that is proposed for continued public access. The County is concerned with the proposal to extend the training space down to ground level in this area.

Chapter 3.1: Geological Resources:

Page 3.1-35 and 36: Given the significance of the Salt Cave, the County maintains that the Navy should avoid the resource as part of its training. The Navy should also provide regular (i.e. quarterly) public tours of this resource as a mitigation measure. The fact that the Cave is located within the Navy’s proposed “Immediate Action Drill Ground Maneuver Area and Close Air Support Target Area” without being designated as an avoidance area is a concern to the County.

Chapter 3.2: Land Use:

Figure 3.2-9, Page 3.2-45: This figure should include the Navy’s Proposed WDZ/SDZ for sake of full disclosure. The County doesn’t understand why the Navy’s proposed withdrawal includes a portion of existing transmission corridor and the west-wide energy corridor as shown in this Figure. The withdrawal should avoid these corridors.

Page 3.2-54: The Navy must better disclose and describe the pertinent public land laws that they would propose Congress leave in place versus those they will request for withdrawal in this section. This disclosure must be made for the Bravo Ranges, DVTA, SLMO and Shoal Site. Perhaps a table could be utilized to better describe the Navy’s proposed action. Federal Laws such as the Federal Land Policy Management Act are the underpinnings to federal land management, and without disclosing which laws would continue to apply and which would not, then the NEPA document doesn’t fully disclose the potential impacts to future land uses within the analysis area.

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Page 3.2-54 and 55: It doesn't appear that the Navy incorporated any of the County's proposed Management, Monitoring and Mitigation items proposed in the County comments to the Draft EIS. This reflects either the Navy's disregard for these issues of importance to the County, or their lack of review of the County's comments.

Page 3.2-58: Page 3.2-65: The impact conclusion that *Alternative 3 would result in less than significant impacts on land use* is simply wrong on its face. The fact that the Navy has not disclosed what federal lands laws are being proposed for "withdrawal" invalidates this conclusion alone.

Chapter 3.3: Mining and Mineral Resources:

Page 3.3-73: The Navy needs to better define what is meant by "nominal amount". This should include at a minimum all holding costs paid by the claimant to Federal, State and Local government as well as some portion as to the value of the claim itself.

Page 3.3-48 and 72: The County still questions whether these RFDs provide for an economically viable project and would once again request that the Navy coordination with and input from the geothermal operators currently located in Churchill County.

Page 3.3-72: This section needs to disclose the impacts to the Nevada Iron operation, including the impact that closing Pole Line Road would have on their proposed operation.

Page 3.3-73 and 74: The County appreciates the disclosure that geothermal development in the DVTA will be managed under the Geothermal Steam Act of 1970. Similar disclosures need to be made in terms of which areas will be withdrawn from the Mining Act as well as other pertinent public land laws such as FLMPA which have a direct nexus to permitting associated infrastructure (i.e. power, pipelines, roads, etc.) of geothermal and mining development.

Page 3.3-76: Given the direct and significant nexus between geothermal exploration and development / power production and County socioeconomics, the affected Counties should be included as signatories on any MOU between the Navy and BLM in terms of geothermal projects in the DVTA and SLMO. These projects also require County permitting, which further reinforces the need for the County to be a signatory.

Chapter 3.4: Livestock Grazing:

Page 3.4-29: The County appreciates the significant changes made to this section of the FEIS. However, the Navy should still specifically disclose that compensation will be provided for permittee's lost Animal Unit Months as well as the remaining balance on any business loan for lease payments. In addition, permittees and lease holders should be given a 3-year tax deferral on the sale of the allotment and any cattle, due to the withdrawal, to allow them to find replacement property.

Chapter 3.5: Transportation:

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Page 3.5-42: Churchill County requests the same provisions be made for re-routing of Pole Line Road and Sand Canyon Road around the north boundary of B-20 and B-16 respectively, which would also serve as a fire break.

Page 3.5-45: This statement is incorrect unless the Navy can ensure that existing minor County Roads will not be closed. The statement in red text makes little to no sense in the context of transportation.

Alternative 3 would have no transportation or access impacts on the DVTA. The Navy is currently proposing to expand the ROW only on the west side of the current transmission corridor (close to the current line as possible) to be a 90-foot permanent and 300-foot temporary ROW for development along the west side of the State Route 121.

Page 3.5-45: The summary of impacts, and this section in general need to disclose the following information: Churchill County has completed an inventory of roads in the County that qualify as R.S. 2477 Roads. This inventory physically mapped these roads, documented their existence, use and maintenance to verify that they would qualify as roads granted to the County Under 43 U.S.C 932. These roads are formally recognized by the County as “minor county roads” and open for public use under the laws of the State of Nevada. These roads were further expressly recognized and preserved for public use through the enactment of the Federal Land Policy Management Act of 1976 (See § 701(a)).

Subsequent analysis indicates that over 100 miles of these RS 2477 qualified roads would be closed by the Navy’s proposed expansion of Bravo Ranges, and over 250 miles would be affected by the Navy’s proposed expansion of the Dixie Valley Training Area.

Chapter 3.6: Airspace:

Figure 3.6-7, Page 3.6-26: A separate figure needs to be added for any restricted airspace, or any airspace in general where the floor is proposed to extend to ground surface. This map / maps need to include existing infrastructure such as State Highways, power lines, etc.

In particular, the County questions the orientation of R4816N Low and R4816S Low as it appears to overlap SR 121 and multiple power transmission lines in the Dixie Valley. This proposed change also negatively affects development of the Dixie Valley Water Project as the proposed airspace and extending the floor to ground level will require buried power lines, etc. The County would propose leaving the floor at 100’ AGL in order to avoid conflicts with existing infrastructure, planned infrastructure and public access to the DVTA.

Figure 3.6-29: The County questions the validity of this statement given that the Navy is proposing airspace down to ground level in the Dixie Valley where existing infrastructure and public access is proposed to be maintained.

Chapter 3.7: Noise:

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Page 3.7-81: Management practices should include continued coordination and planning with Churchill County as well as continuation and increased funding for the REPI program to assist with maintaining open space in areas of significant noise impacts within the County.

Page 3.7-83: The summary of affects should mention the potential impacts to wildlife, particularly Greater Sage-grouse, with an appropriate reference to the sections where this is discussed in more detail. See the Counties specific comments to this regard in Chapter 3.10.

Chapter 3.8: Air Quality:

Chapter 3.9: Water Resource:

Page 3.9-38: The County appreciates the clarification regarding continued use of the Scheckler Spill and access to the Range for flood management purposes. However, the County maintains that it should also be signatory to any MOU developed between the Navy and BOR.

Chapter 3.10: Biological Resources:

Figure 3.9-22, Page 3.9-62: The County appreciates a map that includes spring and guzzler locations as these are critical water resources. However, WDZs and target areas should be included on these maps in order to show the potential direct effect of Navy activities on such areas.

A minor adjustment to the B-17 withdrawal area should be made to exclude the guzzler located between Bell Flat and SR 361 in Churchill County as this area is popular for big game hunting and viewing.

Figure 3.9-25, Page 3.9-67: A minor adjustment to the B-20 withdrawal area should be made to exclude the existing wells and certified water rights on the northeast corner of B-20. This is an important water source for the Nevada Iron Project and a small adjustment would avoid the impact or need for compensation or other mitigation.

Page 3.9-73: The County appreciates this addition; however, the County is looking for more assurance for implementation of the Dixie Valley Water Project. The below language isn't a clear assurance that the Dixie Valley Water Project will be allowed to move forward.

*Under Alternative 2 and 3 (Preferred Alternative), the Navy would incorporate mitigation by proposing to allow development of water resources activities to continue on certain **withdrawn areas as long as the actions are consistent with training activities and approved by the Navy.** The Navy is currently proposing the following required design features for water development.*

Page 3.9-73: The County remains concerned about the increased cost of implementing the Dixie Valley Water Project if power lines from SR 121 to well sites will need to be buried. In discussions with NV Energy and local electrical co-ops that provide services to similar wells, it has been suggested that buried lines to well increase overall cost by 2 – 4 times. That is a significant increase to the County to access its primary future water supply.

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The County would suggest that leaving the airspace floor at 100' above ground level rather than extending the floor down to ground level would mitigate this concern as overhead power to the wells could be installed on lines 50' in height or lower.

Page 3.9-78: Given the importance of the Dixie Valley Water Project to the County and NAS Fallon and its employees / trainees, the impacts of the proposed alternatives should be summarized in these tables.

Chapter 3.10: Biological Resources:

Figures: All range-specific features should include the WDZ and target areas so that areas of direct impacts can be visually understood.

Table 3.10-29, Page 3.10-165: The County is concerned about the 919 acres overlap of R-4816S Low and bighorn habitat given this area consists of critical lambing habitat as well as the one Navy-documented occurrence of Greater Sage-grouse.

Page 3.10-174: The County adamantly disagrees with the impact conclusion that any of the action alternatives would NOT result in significant impacts on biological resources.

Chapter 3.11: Cultural Resources:

Page 3.11-46: The County doesn't believe the Navy can justify the conclusion that "*...no significant impacts on cultural resources would occur.*" This is based on the Navy's own disclosure in Section 3.11.3.6 However, "*the Navy acknowledges that there may be impacts that have yet to be defined and will continue to develop and incorporate mitigation measures as necessary.*"

The County is extremely disappointed that the Navy isn't proposing a managed access program that allows the public to access cultural resources in the Bravo Ranges. This is also a significant tribal concern that has yet to be rectified.

Chapter 3.12: Recreation:

Figure 3.12-9, Page 3.12-18: A minor adjustment to the B-17 withdrawal area should be made to exclude the guzzler located between Bell Flat and SR 361 in Churchill County as this area is popular for big game hunting and viewing.

Figure 3.12-11, Page 3.12-21: A minor adjustment to the B-20 withdrawal area should be made to exclude Wildhorse Spring as this area is popular for big game hunting and viewing.

Page 3.12-58: The County has reviewed the proposed MOA in Appendix D, and an MOA that can be terminated with 30-days' notice is not adequate assurance that controlled access for hunting will be allowed. A stronger assurance for controlled access for both hunting and OHV events must be offered by the Navy.

The County would like to discuss the details of the proposal to transfer Navy-owned lands to the US Fish and Wildlife Service as well as the BLM to mitigate impacts to the Fallon NWR.

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The County questions why this offer was never extended to it or other affected entities. The County may be interested in Navy-held lands.

Chapter 3.13: Socioeconomics:

Page 3.13-1: The Navy's analysis of Churchill County's Master Plan in relation to its customs and culture failed to incorporate much of Chapter 12 dedicated to its Policy Plan for Public Lands, which is probably more directly related to the impacts of the proposed FRTC project. The County appreciates the Navy's attempt to address the below text but feels that most of the excerpt is still relevant. See below excerpts from the Chapter 12, and update this analysis to include these key aspects (*emphasis added*):

Public Lands are part of the rich heritage of Churchill County. From the earliest mining activities, to modern day ranching, energy development, and military training, the use of public land resources has been an integral part of the rural lifestyle and local economy. The county and citizens support the continued multiple use of the public lands in Churchill County. The policies are intended to further agriculture, mining, military training, renewable energy development and recreation, as principal economic bases of the county.

Open public access to recreation, wildlife, and resources should be available to all. The multi-use nature of public lands requires that management decisions be made with the public's interest at the forefront, and careful consideration to maintaining sustainable resources for future generations. The county desires to maintain a thriving ecological balance among all species and resources found on public lands. This includes wild horse herds, managed at populations that are consistent with the land's capacity to support them, wildlife populations that are sustainable via hunting and natural predation, and livestock populations controlled by careful management of grazing permits.

Churchill County recognizes that certain private property interests exist on public lands. Any established private property, including mining claims, water rights, access easements, or any other private interests, must be upheld and the property owners should be considered as equal stakeholders in decisions that may affect their interests.

*This policy portion of the Churchill County Master Plan outlines expectations and desires of the people of Churchill County, and requires consultation prior to decisions that affect public lands within the County's boundaries. Churchill County is desirous of cooperation from the Bureau of Land Management and other Federal agencies in being guided by these policies. **If at any time, according to the National Environmental Protection Act (NEPA), FLPMA or any other legislation, the U.S. Government (under any agency) intends to change uses or availability of resources on public lands in a way that will impact current historical and cultural uses, input from the citizens of the County is required and the Board of County Commissioners will be consulted. In addition, the County Commission should be consulted on any interpretation of these policies.***

The above excerpt from the Introduction to Chapter 12 should lead the Navy to a different conclusion as to the social impacts associated with the withdrawal of substantial withdrawal of

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public lands in Churchill County. The same could be said for the previous comments that have been submitted after review and approval of the County Commission.

Page 3.13-1 and 2: The County appreciates the Navy's attempt to classify social impacts, but adamantly disagrees that social impacts would not be significantly impacted.

Page 3.13-9: Based on the Navy's summary of the County's previous comments, the social analysis should have been updated to include the loss of access to public lands currently managed for multiple use. The County appreciates the Navy's current attempt but still feels that the analysis does not fully explore the full implication of the proposed expansion on socioeconomics.

Page 3.13-55: Once again, the County asks the Navy to estimate economic loss (as it has for other economic sectors) based on the impact of the RFDS of potential loss of at least one geothermal plant, one locatable mineral operation, etc.

Page 3.13-60 and 61: The County requests disclosure of significant social impacts in the impact conclusion section, due in large part to the loss of public land access and the transfer or large areas of public lands from multiple use management to single use.

The County disagrees with the conclusion that impacts to agriculture, recreation and tourism recreation is not significant.

The County agrees that significant impacts to geothermal and mining opportunities will be significant and finds it ironic that this is the one sector where financial impacts were not estimated. The County once again requests a financial analysis of this impact.

Chapter 3.14: Public Health and Safety:

Page 3.14-65: The County appreciates that the Navy is developing a Wildland Fire Management Plan, it is a bit surprising the such a plan didn't exist prior to now. However, such a plan is not going to alleviate the risk of fire unless the Navy requests and acquires funding to implement the plan. Given the Navy's proposal will both increase fuel loading (removal of livestock) on Bravo Ranges and increase ignition risks (more targets, lower flight floors) increased wildfire remains a significant unresolved concern.