

NATIONAL RIFLE ASSOCIATION OF AMERICA

INSTITUTE FOR LEGISLATIVE ACTION

11250 WAPLES MILL ROAD

FAIRFAX, VIRGINIA 22030



NRA

January 30, 2006

Superintendent
Mojave National Preserve
2710 Barstow Road
Barstow, CA 92311

Dear Sir,

The NRA would appreciate having this letter included in the public comment record on the Mojave National Preserve Environmental Assessment pertaining to the conversion of 12 ranching wells into wildlife guzzlers.

The NRA is a strong advocate of building and maintaining artificial sources of water on public lands where such structures provide needed water in desert climates, like the Mojave Desert, for game, non-game, and threatened and endangered species. On behalf of our hundreds of thousands of members in California, we support the reactivation of the 12 wells in the Lanfair Valley.

It is unfortunate that the 12 wells were deactivated in the process of transferring lands to the National Park Service (NPS). That decision removed valuable water sources that had sustained local wildlife populations for decades. Reactivation is the right management decision. The "no-action" alternative, which would keep the wells closed, is unacceptable.

The NRA is also opposed to the third alternative which will have the same effect as the "no action" alternative. It is a paralysis by analysis approach to wildlife management. The NPS has had ample opportunity to gather data about natural springs and wildlife populations and the availability and need for artificial water. In fact, the NPS has had 11 years to conduct such studies, from 1994 when the Preserve was expanded until now.

A science-based management approach should have been used before decisions were made to close the 12 water developments. The NPS could have easily allowed those water sources to remain open, conducted the necessary studies, and used the resultant information to form sound science-based management decisions.

Delaying the reactivation of the wells pending the outcome of further studies will continue to deny a valuable source of water to the Preserve's wildlife. Nothing in the EA suggests that serious harm will come from reactivation. Historical use can be of some guide. Wells have been

present on land now in the Preserve for decades and these wells have provided important sources of water to wildlife in a region greatly altered by man. If anything, the deactivation of the wells creates the environmental risk that the NPS is obligated to cure.

We believe there can be a middle ground between reactivating the wells with no additional research and delaying reactivation until research can be conducted. The NRA recommends modifying the alternative that is based on the California Department of Fish and Game's proposal by immediately reactivating the wells with the proviso that the NPS will conduct research on the effects of the wells on those species that use the water sources, including the level of predation that may be taking place, and address the real impacts to soils and plants.

There does not appear to be any necessity to conduct studies in designated wilderness areas, as the EA recommends, because the wells to be reactivated are not located in those areas. The EA calls for installation of infrared cameras at natural water source locations. The same kind of cameras could just as easily be installed at the reactivated wells to help state and federal biologists monitor and assess artificial and natural water source use by wildlife.

There is no risk to endangered species by this approach, especially to the Mojave Desert Tortoise, which has been the subject of a number of federal management plans. These tortoises are not found in the area of the 12 wells and, if they were, the structure of the wells would prevent them from getting into the wells and drowning.

Reactivating the wells is also in keeping with the Department of the Interior's mission to enhance communication, consultation and cooperation in the service of conservation. In this instance, the California Department of Fish and Game along with conservation organization and individual volunteers will cover the cost of construction and labor to reactivate the wells, including follow up monitoring, management and research.

If research show that the wells are a detriment to wildlife that use them (through predation or entrapment) or impose major impacts to cultural, historical or natural areas around the wells, then the wells can be once again capped. In summary, the NRA recommends that the 12 wells in Lanfair Valley be reactivated as soon as possible.

Sincerely,



Susan Recce
Director
Conservation, Wildlife and Natural Resources