

# **EXHIBIT 1**

Joint Statement by  
The Honorable John Rood  
Under Secretary of Defense for Policy  
Office of the Secretary of Defense  
And  
Vice Admiral Michael Gilday, USN  
Director of Operations  
The Joint Staff

Before the 116th Congress  
Committee on Armed Services  
U.S. House of Representatives  
January 29, 2019

## **Introduction**

Chairman Smith, Ranking Member Thornberry, distinguished Members of the Committee: Thank you for the opportunity to testify before you today on Department of Defense (DoD) support to the Department of Homeland Security (DHS) U.S. Customs and Border Protection (CBP) mission to secure the southern border of the United States.

## **The Department of Defense Has a Long History of Supporting Border Security**

DoD has a long history of supporting efforts to secure U.S. borders. Since the early 1990s, DoD has supported civilian law enforcement agency border security activities, counterdrug activities, and activities to counter transnational organized crime and other transnational threats. Active, Reserve, and National Guard personnel have provided operational military support, such as aerial reconnaissance, ground surveillance, search and rescue support, and medical support. DoD has loaned facilities and special equipment, such as aerostats, ground surveillance radars, and ground sensors to CBP. DoD has also provided temporary housing support to the Department of Health and Human Services (HHS) as part of the national response to the surge of unaccompanied alien children (UAC) at the U.S. southern border. From 2012 to 2017, DoD provided shelter for nearly 16,000 UAC, who received care, security, transportation, and medical services from HHS. Consistent with section 2815 of the National Defense Authorization Act for FY 2017 (Public Law 114-328), the Secretary of Defense certified that providing this sheltering support to HHS would not negatively affect military training, operations, readiness, or other military requirements, including National Guard and Reserve readiness.

At the direction of President Bush, in support of CBP's Operation Jump Start, DoD provided National Guard personnel (6,000 from June 2006 - July 2007; 3,000 from July 2007 - July 2008) to augment and enhance CBP's ability to execute its border security mission. National Guard personnel provided aviation, engineering, medical, entry identification, communications, vehicle maintenance, administrative, and other non-law enforcement support. In addition, the National Guard improved the southern border security infrastructure by building more than 38 miles of fence, 96 miles of vehicle barrier, more than 19 miles of new all-weather road, and road repairs exceeding 700 miles. At the direction of President Obama, DoD provided

up to 1,200 National Guard personnel annually from 2010 to 2016 in support of CBP's Operation Phalanx. National Guard personnel provided aerial reconnaissance, analytical support, and support to counterdrug enforcement activities that enabled CBP to recruit and train additional officers and agents to serve on the border.

#### **DoD Works Closely with the Department of Homeland Security on Requests for Assistance**

Across the full-range of support that DoD has provided DHS – border security support, disaster support, special event security support, and support for protection of the President – DoD has worked closely with DHS, as DHS develops its requests for DoD assistance as deliberately, expeditiously, and effectively as possible to meet mission needs.

DoD carefully considers all requests for assistance, including in order to determine whether DoD has the requested capabilities and resources and whether providing the requested assistance is consistent with the law. When a request is approved, DoD works with the requester to select the right forces and resources to meet the requester's mission needs, and to avoid or mitigate the potential impacts on military readiness. DoD has used the same process for every DHS request for assistance related to DHS's border security mission.

#### **Current Department of Defense Border Security Support**

In his April 4, 2018, memorandum, "Securing the Southern Border of the United States," the President directed the Secretary of Defense to support DHS in "securing the southern border and taking other necessary actions to stop the flow of deadly drugs and other contraband, gang members and other criminals, and illegal aliens into this country." The President also directed the Secretary of Defense to request the use of National Guard personnel to assist in fulfilling this mission, pursuant to section 502 of title 32, U.S. Code, and to use such other authorities as appropriate and consistent with applicable law. The President also directed the Secretary of Defense and the Secretary of Homeland Security, in coordination with the Attorney General, to determine what other resources and actions are necessary to protect our southern border, including Federal law enforcement and U.S. military resources.

From April 2018 to the present, National Guard personnel have supported CBP Operation Guardian Support, augmenting CBP efforts to secure the southern border. National Guard personnel have performed a range of administrative, logistical, and operational support tasks, freeing U.S. Border Patrol agents from these duties and enabling more U.S. Border Patrol agents to patrol the border. National Guard support to CBP Operation Guardian Support is scheduled to continue through September 30, 2019.

From October 2018 to the present, active-duty military personnel have supported CBP Operation Secure Line by providing: aviation support (e.g. transporting CBP quick reaction forces); engineering support (e.g., hardening U.S. ports of entry (POEs), providing temporary barriers, and emplacing concertina wire); planning support; last line of outward defense protection for CBP personnel performing their Federal functions at POEs; and loaned personnel protective equipment (e.g., helmets with face shields, hand-held shields, and shin guards). Active-duty military personnel were selected because the Secretary of Defense determined them to be the best-suited and most readily available forces from the Total Force to provide the assistance requested by the DHS. Then, as now, the Department continually assesses the necessary force composition and layout. We adjust as necessary to meet mission requirements, while minimizing impacts on readiness, as well as consider future and global response military operational requirements. For example, the protection of CBP personnel performing their Federal functions at POEs will shift to a contingency basis (i.e., available when needed), starting February 1, 2019. Likewise, with each approved request, we ensure that the assigned military forces are trained and prepared to execute the mission in support of CBP.

On January 11, 2019, the Acting Secretary of Defense approved a DHS request for additional active-duty military support of CBP Operation Secure Line. These military personnel will operate mobile surveillance cameras in Arizona, California, New Mexico, and Texas in all nine Border Patrol Sectors, and emplace concertina wire on existing barriers at areas designated by CBP along the southern border between POEs in Arizona and California. The mobile surveillance camera support is currently scheduled to continue through September 30, 2019. CBP has requested that an additional 150 miles of concertina wire be emplaced no later than March 31, 2019.

All of this military support has been – and will continue to be – provided consistent with the law, including the Posse Comitatus Act, section 1385 of Title 18, U.S. Code. Military personnel have supported civilian law enforcement efforts, but do not participate directly in law enforcement activities, such as search, seizure, and arrest. Military personnel protecting CBP personnel performing their Federal functions at POEs are, consistent with the April 1971 opinion of the Department of Justice Office of Legal Counsel, also complying with the Posse Comitatus Act.

### **Conclusion**

The military's presence and support increase the effectiveness of CBP's border security operations, free U.S. Border Patrol agents to conduct law enforcement duties at the southern border, and enhance situational awareness to stem the tide of illegal immigration, human smuggling, and drug trafficking along the southern border. The ongoing temporary DoD support is a continuation of DoD's long history of supporting DHS and CBP in their mission to secure the U.S. border. These decisions are far from static, as we continue to work with the Services, the National Guard Bureau, and U.S. Northern Command to evaluate mission requirements and associated risks.

Chairman Smith, Ranking Member Thornberry, distinguished members of the Committee, thank you for the opportunity to testify before the committee.

# **EXHIBIT 2**

Statement by  
Robert G. Salesses  
Deputy Assistant Secretary of Defense  
for Homeland Defense Integration and Defense Support of Civil Authorities  
Department of Defense

Before the 116th Congress  
Committee on Homeland Security  
Subcommittee on Border Security, Facilitation, and Operations  
U.S. House of Representatives  
June 20, 2019

## **Introduction**

Chairwoman Rice, Ranking Member Higgins, distinguished Members of the Subcommittee: Thank you for the opportunity to testify today on Department of Defense (DoD) support to Department of Homeland Security (DHS), Department of Health and Human Services (HHS), and Department of Justice (DOJ) missions related to the security of the southern border of the United States.

## **The Department of Defense Has a Long History of Supporting Border Security**

Using the substantial authorities Congress has provided, DoD has a long history of supporting efforts to secure U.S. borders.

### **Steady State**

Active-duty and National Guard personnel have supported Federal and State counterdrug activities (e.g., detection and monitoring of cross-border trafficking, aerial reconnaissance, transportation and communications support, and construction of fences and roads) beginning in the early 1990s. Most recently, U.S. Northern Command's Joint Task Force-North executed 53 counterdrug support missions in fiscal year (FY) 2017 and 23 missions in FY 2018. When the Secretary of Defense approved the four border States' plans for drug interdiction and counter-drug activities, DoD committed \$21 million in funds in FY 2017 and \$53 million in FY 2018.

When needed, DoD has provided planners to help DHS develop its Southern Border and Approaches Campaign (2014) and CBP's Crisis Migration Plan (2018).

DoD has also loaned facilities and special equipment, such as aerostats, ground surveillance radars, and ground sensors, to CBP.

### **Surge Support**

- *Post-9/11 (2002)*: 1,600 National Guard personnel were detailed to the U.S. Customs Service, the Immigration and Naturalization Service, and the Border Patrol at northern and southern borders.

- *2004-2005 – Operation WINTER FREEZE:* 129 Active-duty and National Guard personnel were deployed to northern border to interdict suspected transnational threats.
- *2006-2008 – Operation JUMP START:* 6,000 National Guard personnel were deployed at the southern border from 2006-2007 and 3,000 National Guard personnel from 2007-2008. National Guard personnel improved infrastructure at the southern border by building more than 38 miles of pedestrian fence, 96 miles of vehicle barrier, more than 19 miles of new all-weather road, and repairing more than 700 miles of roads.
- *2010-2017 – Operation PHALANX (2010-2017):* Up to 1,200 National Guard personnel were deployed at the southern border from 2010 to 2012 and 200-300 National Guard personnel at the southern border from 2013-2017, conducting detection and monitoring, aviation support, aerial reconnaissance, and analytical support missions.
- *2012-Present – Housing Support for Unaccompanied Alien Children.* DoD has provided temporary housing support to the Department of Health and Human Services (HHS), on a reimbursable basis, as part of the national response to the surge of unaccompanied alien children (UAC) at the U.S. southern border. Since 2012, DoD has provided DoD property for HHS to shelter nearly 16,000 UAC, who receive care, security, transportation, and medical services from HHS. Consistent with section 2815 of the National Defense Authorization Act for FY 2017 (Public Law 114-328), the Secretary of Defense has certified that providing this sheltering support to HHS will not negatively affect military training, operations, readiness, or other military requirements, including National Guard and Reserve readiness. A summary of this support is provided in the following table:

<b>DoD Installation</b>	<b>Duration</b>	<b># of UACs</b>
Lackland, AFB, TX	April 4-June 13, 2012	800
Lackland, AFB, TX	May 18-August 8, 2014	4,357
NAVBASE Ventura, CA	May 18-August 8, 2014	1,540
Ft. Sill, OK	May 18-August 8, 2014	1,861
Holloman AFB, NM	January 25-February 27, 2016	129
Ft. Bliss, TX	September 6, 2016-February 8, 2017	7,259
	<b>TOTAL</b>	<b>15,946</b>

DoD's presence and support at the southern border increases the effectiveness of CBP's border security operations, helps free up Border Patrol agents to conduct law enforcement duties, and enhances situational awareness to stem the tide of illegal activity along the southern border of the United States.

The numbers and types of migrants arriving at the southern border of the United States has exceeded the capacity of CBP, prompting the need for additional DoD support.

#### **The President Directed DoD to Support DHS**

Since April 2018, DoD support to DHS has been provided pursuant to the President's direction, including his April 4, 2018, Presidential memorandum, "Securing the Southern Border of the United States." In this memorandum, the President directed DoD to support DHS "in securing the southern border and taking other necessary actions to stop the flow of deadly drugs and other contraband, gang members and other criminals, and illegal aliens into this country." The President also directed DoD to request use of National Guard personnel to assist in fulfilling this mission, including pursuant to Section 502 of Title 32, U.S. Code. Finally, the President directed the Secretary of Defense and the Secretary of Homeland Security, in coordination with the Attorney General, to determine what other resources and actions are necessary to protect our southern border, including Federal law enforcement and U.S. military resources.

### **DoD Works Closely With DHS**

Across the full-range of support that DoD has provided DHS – border security support, disaster support, special event security support, and support for protection of the President – DoD has worked closely with DHS as DHS develops its requests for DoD assistance as deliberately, expeditiously, and effectively as possible to meet mission needs.

DoD carefully considers all requests for assistance, including in order to determine whether DoD has the requested capabilities and resources and whether providing the requested assistance is consistent with applicable law. When a request is approved, DoD works with the requesting department or agency to select the right forces and resources to meet the requested mission needs. DoD has used the same process for every DHS request for assistance related to DHS's border security mission.

Specific DoD support is driven by DHS requirements. DoD, consistent with the President's order, statutory authority, and operational considerations, helps DHS develop requests that will meet DHS requirements while mitigating potential impacts on military readiness, to the extent practicable. Consistent with the law and the President's order, DoD support is currently being provided on a non-reimbursable basis, to the extent legally available. DoD support is also provided consistent with Section 275 of Title 10, U.S. Code, and the Posse Comitatus Act (Section 1535 of Title 18, U.S. Code), which do not permit direct participation by military personnel in a search, seizure, arrest, or other similar activity.

### **DoD Support**

#### **April 2018 to September 2019 – Augmentation (Badges Back to the Border)**

- In support of CBP Operation Guardian Support, DoD has authorized National Guard personnel to support CBP in a duty status under Section 502 of Title 32, U.S. Code, with the consent of, and under the command and control of, their governors.
- Types of support: aviation; communications; fleet maintenance; intelligence analysis; planning; and surveillance.
- At its peak, on November 26, 2018, 2,295 National Guard personnel supported CBP Operation Guardian Support (369 in California; 603 in Arizona; 119 in New Mexico; and

1,204 in Texas). As of June 5, 2019, 1,776 National Guard personnel were supporting CBP Operation Guardian Support (137 in California; 550 in Arizona; 18 in New Mexico; and 1,227 in Texas).

June to December 2018 – Attorney Support for the Department of Justice

- DoD detailed 21 attorneys with criminal trial experience to the Department of Justice (DOJ) to serve as Special Assistant United States Attorneys (SAUSAs).
- This detail of DoD personnel was executed pursuant to the Economy Act and was on a fully reimbursable basis.

October 2018 to January 2019 – Enhanced Security of Ports of Entry

- Active-duty military personnel support to CBP Operation Secure Line. Active-duty military personnel were selected because the Secretary of Defense determined that such personnel were the best-suited and most readily available forces from the Total Force to provide the assistance requested by DHS.
- Types of support:
  - Military planning teams to coordinate operations, engineering, medical, and logistics support.
  - Medium-lift rotary-wing aviation support, on-call 24-hours a day, to supplement the movement of CBP quick-reaction force tactical personnel in and around locations determined by CBP day or night.
  - Strategic lift aviation support, available with 12-hour notification, to move up to 400 CBP personnel and equipment to a location determined by CBP.
  - Engineering capability support that can provide temporary vehicle barriers and pedestrian-style fencing at and around a port of entry (POE), including but not limited to: continuous anti-personnel intrusion fencing; one-way retractable vehicle anti-intrusion barricades; configurable pedestrian fencing; and fixed vehicle barricades. Based on an additional DHS request, concertina wire emplacement continued through March 2019. Ultimately, DoD personnel hardened 33 POEs and emplaced 200 miles of concertina wire.

- Deployable medical units to triage and treat, up to 1,000 personnel every 24 hours. Such units were prepared to stabilize and prepare injured personnel for commercial transport to civilian medical facilities, as necessary.
- Temporary housing for up to 2,345 CBP personnel.
- Loan of personnel protective equipment (e.g., helmets with face shields, hand-held shields, and shin guards) for 500 CBP personnel.
- At its peak, on November 7, 2018, 5,622 active-duty military personnel supported CBP Operation Secure Line.

#### November 2018 through March 2019 – Force Protection for CBP

- On November 20, 2018, the President authorized DoD to use military personnel to protect CBP personnel performing their Federal functions within property controlled by CBP at or adjacent to one or more designated POEs.
- Although DoD military personnel were prepared to protect CBP personnel, they were not required to do so.

#### February 2019 – Crisis Support

- The Acting Secretary of Defense approved a DHS request for support at CBP-designated POEs in the Del Rio and Laredo Sectors in Texas.
- Types of support:
  - Military protection of CBP personnel performing their Federal functions on property owned by CBP at or adjacent to one or more designated land POEs where caravan members presented a risk of disrupting or otherwise interfering with CBP's ability to carry out its Federal functions.
  - Immediate lifesaving medical care for CBP personnel and migrants pending expeditious movement to civilian medical facilities.
  - Placement of temporary vehicle barriers and pedestrian-style fencing and emplacement of concertina wire at and around CBP-designated POEs.
  - Medium-lift rotary-wing aircraft and support personnel for tactical movement of CBP personnel (24-hour on-call ability to employ two simultaneous lifts of six-to-eight personnel and associated equipment).

March to September 2019 – Crisis Response Force

- The Acting Secretary of Defense approved a DHS request for crisis response support.
- Types of support:
  - On a contingency basis (i.e., available when needed), a medical response capability to treat up to 100 persons during a violent incident. DoD medical personnel would provide immediate life-saving care at the point-of-injury.
  - On a contingency basis, a minimum of two Military Police platoons, and not to exceed one Military Police company, capable of responding to multiple locations designated by CBP to provide force protection of CBP personnel performing their Federal functions on property owned by CBP at or adjacent to POEs.
  - One Military Police platoon to conduct, at a minimum, monthly exercises and training with CBP personnel.
  - Engineering support to: (a) emplace temporary vehicle barriers, temporary fencing, and concertina wire at and adjacent to CBP-designated POEs; and (b) harden land POEs at the southern border in Texas.
  - Medium-lift, rotary-wing aircraft and support personnel for the tactical movement of six to eight CBP personnel at and around POE locations designated by CBP.
  - Extension of DoD's loan of personnel protection equipment.

January through September 2019 – Detection and Monitoring

- The Acting Secretary of Defense approved a DHS request for DoD detection and monitoring support.
- Type of support: mobile surveillance camera operators in 146 vehicles operating in Arizona, California, New Mexico, and Texas in all nine Border Patrol Sectors. In May 2019, the Acting Secretary of Defense approved a request to increase the number of mobile surveillance camera vehicles to 155.

March through Present 2019 – Blocking Drug-Smuggling Corridors

- In accordance with Section 284(b)(7) of Title 10, U.S. Code, the Secretary of Defense may, in support of the counter-narcotics activities of Federal civilian law enforcement agencies, construct roads and fences, and install lighting, to block drug-smuggling corridors across the international boundaries of the United States.

- In March 2019, the Acting Secretary of Defense approved a DHS request to use this authority to block drug-smuggling corridors in the Yuma Sector in Arizona and the El Paso Sector in New Mexico, specifically by constructing 51 miles of fencing, constructing and improving roads, and installing lighting.
- In May 2019, the United States District Court for the Northern District of California issued a preliminary injunction prohibiting the use of the \$1 billion transferred pursuant to Section 8005 of the Department of Defense Appropriations Act, 2019, into the Defense Drug Interdiction and Counter-Drug Activities, Defense, account for construction under Section 284 of Title 10, U.S. Code (i.e., construction in the Yuma and El Paso CBP Sectors).
- In May 2019, the Acting Secretary of Defense authorized construction of an additional 78 miles of fencing pursuant to Section 284(b)(7) – this time to block drug-smuggling corridors in the El Centro Sector in California and the Tucson Sector in Arizona.
- In total, the Acting Secretary of Defense directed the transfer of \$2.5 billion into the Drug Interdiction and Counter-Drug Activities, Defense account to block drug-smuggling corridors designated by DHS along 129 miles and in four Sectors along the U.S. southern border (i.e., El Centro in California; Yuma and Tucson in Arizona; and El Paso in New Mexico).

#### June through September 2019 – Migrant Processing Support

- The Acting Secretary of Defense approved a DHS request for support with migrant processing.
- Types of support:
  - 160 licensed DoD military drivers to operate secure CBP vehicles to transport migrants from remote locations, POEs, and Border Patrol stations
  - 100 DoD military personnel to heat and distribute meals and conduct welfare checks.

#### May through September 2019 – Housing

- *Unaccompanied Alien Children*
  - DoD has agreed to support HHS by being prepared to provide capacity to temporarily house up to 5,000 UAC on DoD installations.
  - Consistent with Section 2815 of the National Defense Authorization Act for FY 2017 (Public Law 114-328), the Secretary of Defense is required to certify that providing this sheltering support to HHS would not negatively affect military training,

operations, readiness, or other military requirements, including National Guard and Reserve readiness.

- DoD is currently providing HHS with capacity to house approximately 1,400 UAC at Fort Sill, Oklahoma, consistent with Section 2815.
- This support is provided on a reimbursable basis.
- *Adult Migrants*
  - The Acting Secretary of Defense approved a DHS request for support to shelter up to a total of 7,500 single migrant adults in CBP custody at six CBP-designated locations.

### **The President Declared a National Emergency**

On February 15, 2019, the President declared that “situation at the southern border presents a border security and humanitarian crisis that threatens core national security interests and constitutes a national emergency.” In support of this national emergency, the President invoked two statutory authorities:

- *Section 12302 of Title 10, U.S. Code*, which authorizes the Secretary of Defense to order to active duty up to 1,000,000 members of the Ready Reserve for up to 24 months.
- *Section 2808 of Title 10, U.S. Code*, which authorizes the Secretary of Defense to use unobligated military construction funds to undertake military construction projects, and to authorize the Secretaries of the Military Departments to undertake military construction projects, not otherwise authorized by law that are necessary to support the use of the armed forces in connection with the national emergency.

### **Conclusion**

Chairwoman Rice, Ranking Member Higgins, distinguished Members of the Committee: This ongoing, temporary DoD support is a continuation of DoD’s long history of supporting DHS and CBP in their mission to secure U.S. borders. Thank you for your continued support to DoD and the men and women of the U.S. Armed Forces.

# **EXHIBIT 3**



TESTIMONY OF

Todd Owen  
Executive Assistant Commissioner  
Office of Field Operations  
U.S. Customs and Border Protection

Carla L. Provost  
Chief  
U.S. Border Patrol  
U.S. Customs and Border Protection

Manuel Padilla  
Director  
Joint Task Force-West  
Department of Homeland Security

BEFORE

U.S. House Senate  
Committee on the Judiciary  
Subcommittee on Border Security and Immigration

ON

“At the Breaking Point: the Humanitarian and Security Crisis at our Southern Border”

May 8, 2019  
Washington, DC

Chairman Cornyn, Ranking Member Durbin, and Members of the Subcommittee, thank you for the opportunity to appear before you today to discuss the state of the border.

Our nation is experiencing an unprecedented border security and humanitarian crisis along our southwest border. We have surging levels of individuals entering between ports of entry, or at ports of entry, without proper documentation. We are facing significant throughput challenges associated with processing record numbers of family units and unaccompanied alien children (UAC). We are also experiencing significant challenges, primarily with staffing and transportation, transferring these migrants to other entities for detention or other appropriate disposition. These factors have created both humanitarian and safety concerns; the demographic shift towards more vulnerable populations, combined with overwhelming numbers, has diminished our capacity to prevent deadly narcotics and dangerous people from entering our country. It is because of this crisis that the Department of Homeland Security (DHS) is asking Congress to provide additional funding in 2019, including \$565 million for U.S. Customs and Border Protection (CBP) operations and investments.

### **Situation at the Southwest Border**

As of March 31, 2019, 361,087 migrants have been apprehended between the ports of entry (POEs) in Fiscal Year (FY) 2019, representing a 108 percent increase over the same time in FY 2018. In March alone, the Border Patrol averaged over 3,000 apprehensions each day. Historically, apprehension numbers climb as we reach the summer months, meaning Border Patrol anticipates the number of apprehensions will only increase in the coming months.

There are three trends that make this migration flow a significant challenge for CBP and our nation's immigration system. The first trend is that the majority of migrants arriving at the southwest border are members of family units. In FY 2019 to date, the Border Patrol has seen more than a 374 percent increase in the number of family units apprehended, compared to the same period in FY 2018. Family units and UAC combined make up more than 62 percent of all southwest border apprehensions. These populations are more vulnerable than single adults, and require a more resource-intensive level of care. This does not diminish the significance of single adult apprehensions. While the number of family units and UAC are increasing significantly, the flow of single adults has not stopped—in fact, it has increased as well. By the end of March FY 2019, the Border Patrol apprehended more than 135,000 single adults—the highest number in a fiscal year to date since FY 2014.

The second trend is the demographic makeup of this migration flow. Eighty-three percent of all Border Patrol apprehensions along the southwest border are from the Northern Triangle countries of Guatemala, Honduras, and El Salvador. Unlike UAC from Mexico, federal law prevents the swift repatriation of UAC from Central America.

The third major trend is the increase in claims of a fear of return to a migrant's country of origin. Between 2000 and 2013, less than one percent of those apprehended or encountered at our border claimed a fear of return. In FY 2018, along the southwest border, just shy of 93,000 people claimed a fear of return while in CBP custody—a record number of claims. In FY 2019, we have almost reached that total in the first six months of the fiscal year alone. The high number of

claims, combined with the low initial threshold for credible fear, immigration court backlogs, and the amount of time it takes to process cases creates lengthy stays in the United States while the claim is adjudicated. This facilitates abuse of the asylum system while delaying legitimate claimants in need of protection.

Exacerbating these challenges, the Border Patrol is now apprehending larger and larger groups between ports of entry. In the first six months of FY 2019, CBP encountered 111 large groups composed of 100 or more individuals, totaling 18,664 apprehensions. For comparison, the Border Patrol encountered 13 large groups in FY 2018 and only two large groups in FY 2017.

Human smugglers strategically choose the timing and location for these large group crossings in order to disrupt U.S. border security efforts, create a diversion for the smuggling of narcotics, and allow single adults seeking to evade capture an opportunity to enter the United States. Even worse, many of these smugglers commit horrible acts of violence, sexual assault, and extortion.

Since October 2018, CBP has seen an increase in migrants' use of caravans to make the journey north towards the United States. DHS defines a migrant caravan as an autonomous group of 300 or more individuals organized in advance by non-state actors that travels in a coordinated manner, migrating from one country to another often times, though not exclusively, in violation of a given country's national immigration laws and policies.

Traveling with a caravan is appealing to some migrants because they perceive it provides a safer journey and avoids the thousands of dollars in costs associated with traveling with a human smuggler. The phenomenon of large organized groups transiting Mexico has successfully accelerated migrants' timelines to reach the border by utilizing transportation services provided by state and local governments assisting in moving migrants throughout Mexico. Apprehending a group of 100 to 400 people at one time creates significant operational challenges for CBP officers and agents who have to care for and process these individuals first before continuing their law enforcement mission.

While the men and women of CBP pride themselves in providing appropriate care for those in its custody, the volume of family units combined with unique care and custody requirements has caused CBP to consider the use and expansion of urgent and sustained interagency support to safely and appropriately process migrants. CBP continues to work with its interagency partners to identify options to meet the needs of the increasing numbers of migrants.

The border security and humanitarian crisis at the southwest border continues to present significant operational challenges to CBP, and current trends indicate that it will worsen as we enter the warmer spring and early summer months.

Our short-term holding facilities were neither designed for the large volume of family units nor for long-term custody. We consider 4,000 detainees to be a high number of migrants in custody, and in the past had considered 6,000 detainees a crisis. In this fiscal year, CBP has already experienced more than 14,000 detainees in custody on a single day.

Despite the challenge before us, CBP is committed to effectively using our resources to support border security operations and the ongoing humanitarian efforts.

## **Conditions at the Ports of Entry**

The operational capacity at a POE varies depending on overall port volume, facility capacity, resource constraints, and daily tactical and enforcement activities. Operational tempo at POEs cannot always be planned; for example, we do not know in advance when human, narcotics, or weapons smuggling attempts may be discovered, or which individuals may present a threat to our officers. It takes significant resources to manage this highly uncertain environment.

Similar to what we see between POEs, we are seeing increased numbers of migrants, including family units and other aliens who arrive without proper documents, many of whom claim a fear of return. When large groups of inadmissible aliens, sometimes in the hundreds, arrive at POEs, officers are diverted from their priority missions and our processes are strained in an effort to process all individuals in a humane and efficient manner.

CBP officers are committed to our multifaceted national security and legitimate trade and travel mission sets. The processing of inadmissible aliens is only one aspect of our many missions. CBP's Office of Field Operations (OFO) processes all persons who apply for admission at POEs. At times, due to operational capacity or as necessary to facilitate orderly processing and maintain the security and safety of the traveling public, individuals who arrive without appropriate travel documents may need to wait in Mexico before being permitted to enter the POE.

## **Narcotics**

Illegal drugs continue to flow into the United States at POEs through air, land, and sea environments. CBP has a unique responsibility and a critical role in preventing illicit narcotics, including opioids, from entering our country. CBP, with the support of Congress, has made significant investments in, and improvements to, drug detection and interdiction technology and targeting capabilities at and in-between our POEs. For example, CBP was the first agency in the nation to successfully train and utilize canines in the detection of fentanyl, and is a trendsetter in the use and development of non-intrusive inspection (NII) capabilities.

Marijuana continues to account for the bulk of contraband drugs CBP seized by weight. However, that amount has been on a downward trajectory in the past few years. As we have observed a decline in the amounts of marijuana seized at POEs, interdictions of other drugs are holding steady or increasing. At the end of FY 2018, we saw increases in the amounts of methamphetamine and heroin seized, and compared to this time last year, cocaine seizures between the POEs are up 35 percent.

To counter this, CBP has deployed additional chemical field screening equipment with the ability to presumptively identify more than 14,000 substances, and all OFO concealed human and narcotic detection canine teams across the operational environment have completed training to detect fentanyl and fentanyl analogues.

We use advanced detection equipment and technology, including NII equipment and radiation detection technologies, to maintain robust cargo, commercial conveyance, and vehicle inspection capability at our POEs. NII technologies deployed to our land, sea, and air POEs include large-scale X-ray and gamma-ray imaging systems, as well as a variety of portable and handheld

technologies. NII systems enable CBP officers to examine cargo conveyances such as shipping containers, commercial trucks, and rail cars, as well as privately owned vehicles, for the presence of contraband without physically opening or unloading them.

For FY 2019, CBP has received \$564 million for NII at land POEs. This is a historic investment that will allow CBP to transform its efforts to stop illicit drugs from entering the country through legal crossing points. Combined with \$76.9 million for personnel, lab equipment, canine units, and POE technologies to support countermeasures against opioid trafficking, CBP will be able to increase the number of vehicles crossing our borders that are scanned with cutting edge technology and develop the forensic capabilities necessary to ensure prosecution and criminal sanctions. CBP appreciates the support of Congress for these critically-needed capabilities.

### **Drivers of the Crisis**

The rise in migration is, in part, a consequence of the gaps created by current laws, judicial rulings, and policies related to the treatment of minors. However well-intentioned, they hinder CBP's ability to fulfill its mission.

#### *Flores Settlement Agreement*

The 1997 *Flores* Settlement Agreement provides certain standards governing the treatment of all alien minors in U.S. Government custody. The Agreement requires the government to release alien minors from detention without unnecessary delay, or, if detention is required, to transfer them to non-secure, licensed programs "as expeditiously as possible." *Flores* also sets certain standards for the holding and detention of minors, and requires that minors be treated with dignity, respect, and special concern for their particular vulnerability. CBP complies with the *Flores* Settlement Agreement and treats all minors in its custody in accordance with its terms.

In 2014, in response to the surge of alien families crossing the border, DHS increased the number of family residential centers. Soon after, the U.S. District Court for the Central District of California held that *Flores* applies not only to minors who arrive in the United States unaccompanied, but also to those children who arrive with their parents or legal guardians. The court also ruled that ICE's family residential centers are not licensed nor are they secure facilities. These rulings limited DHS's ability to detain family units for the duration of their immigration proceedings. Pursuant to this and other court decisions interpreting the *Flores* Settlement Agreement, DHS rarely detains accompanied children and their parents or legal guardians for longer than approximately 20 days.

As a consequence of the limitations on time-in-custody mandated by *Flores* and subsequent court decisions, custody arrangements for adults who arrive in this country alone are different from those for adult parents or legal guardians who arrive with their child or children.

#### *UAC Provision of Trafficking Victims Protection Reauthorization Act of 2008*

There are similar treatment differences associated with the provision enacted in the *Trafficking Victims Protection Reauthorization Act of 2008* (TVPRA), Public Law 110-457, providing certain protections to UAC. Specifically, the TVPRA requires that, once a child from a

noncontiguous country is determined to be a UAC, the child must be transferred to the U.S. Department of Health and Human Services (HHS) Office of Refugee Resettlement (ORR) within 72 hours, absent exceptional circumstances. If the UAC is a national or habitual resident of a contiguous country and is determined to be eligible to withdraw his or her application for admission (i.e., not a trafficking victim or likely trafficking victim, does not have a fear of return, and is able to make an independent decision), he or she can be repatriated to that contiguous country. UAC from countries other than Canada and Mexico are not able to be repatriated in this manner pursuant to the TVPRA, which further encumbers the already overburdened immigration system. Currently, more than 80 percent of UAC encountered by Border Patrol are from the non-contiguous countries of Guatemala, Honduras, and El Salvador; therefore, they are not eligible to be repatriated in an expeditious fashion.

The gaps created by layers of outdated laws and judicial rulings related to the treatment of minors are a significant pull factor for family units and UAC. Would-be border crossers know that, under our current system, adults with children will not generally be detained during their immigration proceedings. As word of mouth and social media spread news of their release into the United States, more migrants are emboldened to make the journey. Without Congressional action, this crisis will continue.

### **CBP's Response to the Crisis**

The situation demands whole-of-government solutions, and CBP is addressing this border security and humanitarian crisis with all available resources.

#### *Interagency Border Emergency Cell*

In March, DHS and CBP took the necessary steps to combat the growing security and humanitarian crisis at the southern border. We are undertaking emergency surge operations and immediately increasing temporary reassignment of personnel and resources from across the agency to address the influx of migrants.

A Department-wide call was issued for DHS employees to volunteer to provide support to CBP and U.S. Immigration and Customs Enforcement (ICE) operations on the southwest border. DHS established the Interagency Border Emergency Cell (IBEC) to coordinate DHS and interagency support to the border crisis response effort, improving information sharing and coordinating interagency support to CBP and ICE efforts to bring the situation to a manageable level.

The IBEC provided similar to the coordination efforts in place for responding to major disasters, in an effort to apply the whole-of-government approach to this border security and humanitarian crisis. This week, IBEC transitioned its mission to the Joint Incident Advisory Group.

#### *Personnel*

To confront the unprecedented humanitarian and border security crisis on the southwest border, CBP is temporarily re-assigning CBP officers from POEs nationwide to Border Patrol sectors. This reassignment will impact CBP's ability to process trade and travel at affected locations.

CBP officers will support Border Patrol Sectors with care and custody responsibilities, including hospital watch and transportation. We are working closely with the trade community, local authorities, and other partners to mitigate the impact of reduced staffing at the impacted ports. CBP is also increasing the number of temporary details of Border Patrol agents from northern and coastal border sectors to sectors along the southern border.

CBP is also temporarily assigning non-law enforcement mission support employees who volunteered to augment staffing and operations at critical over-capacity stations and sectors. This employee volunteer force will be temporarily assigned to Border Patrol stations based on operational need relative to the employees' assessed training and skill sets.

#### *Centralized Processing Center*

CBP is also currently taking steps to establish a Centralized Processing Center (CPC) in the El Paso Sector. This will help us protect the health and safety of those in custody while streamlining operations and reducing time in custody. The El Paso CPC, modeled in part on the CPC established in 2014 in the Rio Grande Valley Sector, will provide a centralized location for the processing of migrants, and will facilitate consistent medical assessments in a centralized location before DHS transfers UAC to shelters funded by HHS ORR, and single adults and family units to ICE Enforcement and Removal Operations (ERO).

#### *Infrastructure*

A key component of our strategy is to impede and deny illegal entry, and we are putting the initial investments in the border wall system to good use. Ninety-eight percent of FY 2017-funded border wall replacement projects—approximately 39 miles—were completed by April 12, 2019. The first of these projects began just nine months after funds were received. Typical government construction projects take two years or more to begin. In contrast, construction on border wall projects began within months, in response to the urgent operational need. These projects are nearly complete and are expected to be delivered on time and within budget.

The installation of a modern barrier in key border areas has made a significant positive impact. A two-mile stretch of border immediately west of the Calexico West Port of Entry in Border Patrol's El Centro Sector in California, has been a consistent hot spot for illegal activity. The presence of local pedestrian and vehicle traffic from a shopping center just steps away from the border allowed illegal border crossers to quickly vanish into the community. Since construction of a border wall system—to include complementary technologies—was completed, agents have been better able to prevent individuals from crossing illegally into the United States in this location. Additionally, the steel bollard design has increased agents' safety by allowing agents to maintain a line of sight through the barrier.

Approximately \$800 million in FY 2018-funded construction contracts have already been awarded. In FY 2019, we received \$1.375 billion in funding for additional primary pedestrian barrier; we plan to put that funding to work in the Rio Grande Valley Sector, our highest priority location for wall investment. We also received \$100 million for border surveillance technology, including fixed towers, remote video surveillance systems, mobile surveillance capability

systems, and innovative towers. These investments assist Border Patrol agents in the field, as they increase CBP's ability to detect illegal activity along the border, increase our operational capabilities, and improve the safety of frontline law enforcement personnel. We will aggressively implement the security enhancements supported by these investments, and deploy capabilities consistent with the requirements of our agents on the ground. As our personnel at the border are increasingly redirected to address the humanitarian crisis, we need these tools more than ever to perform our law enforcement mission.

*Interagency, Nongovernmental, and International Support*

CBP requested and received medical field support from the U.S. Coast Guard and the U.S. Public Health Service Commissioned Corps. Teams were deployed to the Yuma, Tucson, and El Paso Sectors to increase capacity to perform pediatric medical checks. We have subsequently expanded the use of contracted medical personnel to perform medical screening in areas of the southwest border where we are experiencing the highest volume of UAC and family unit apprehensions.

We are also coordinating with the Centers for Disease Control and Prevention to gather data on infectious diseases among migrants in custody and develop recommendations for further CBP action. We are seeking advice from external medical experts, including the American Pediatric Association and others.

We have worked with ICE regarding any available surge options for transportation to family residential centers and/or supervised release. We are also reviewing options to relieve recent overcrowding in Border Patrol stations, including engaging with non-governmental organizations and local partners. Across the southwest border, we have been forced to begin directly releasing migrants into American communities to address our capacity limitations. This action is not taken lightly and is only used as a last resort due to the system being overwhelmed. This has required increased daily coordination with ICE and nongovernmental organizations. Without the ability to detain family units in our current system, we have no choice but to release family units while they await court dates that are often years away.

We will also continue to proceed with Department of Defense and interagency requests for assistance to support all of the humanitarian and border security crisis needs that have been identified, and continue to collaborate with the Federal Emergency Management Agency to support CBP's efforts.

Additionally, we will continue our ongoing efforts with the Governments of Mexico and the Northern Triangle Countries to leverage greater collective involvement to address migrant flows.

**Conclusion**

We have dedicated every available resource to stop the flow of illegal migrants and dangerous drugs into the United States, including personnel, technology, and innovating outreach and engagement with international and non-governmental industry partners. However, despite our efforts, we are overwhelmed.

Ultimately, we must confront and address the vulnerabilities in our legal framework in order to achieve lasting change at the border. Each action taken by lawmakers, the judiciary, policymakers, and operators—while made in good faith by people grappling with complex issues—can have unintended effects on our immigration system and our national security. We need Congress to acknowledge the crisis and to take the legislative action necessary to support CBP and our partners.

Thank you for the opportunity to testify. We look forward to your questions.

# **EXHIBIT 4**



PRESIDENTIAL MEMORANDA

## S.J. Res. 54 Veto Message

IMMIGRATION

Issued on: **October 15, 2019**



TO THE SENATE OF THE UNITED STATES:

I am returning herewith without my approval S.J. Res. 54, a joint resolution that would terminate the national emergency I declared in Proclamation 9844 of February 15, 2019, pursuant to the National Emergencies Act, regarding the ongoing crisis on our southern border. I am doing so for the same reasons I returned an identical resolution, H.J. Res. 46, to the House of Representatives without my approval on March 15, 2019.

Proclamation 9844 has helped the Federal Government address the national emergency on our southern border. It has empowered my Administration's Government-wide strategy to counter large-scale unlawful migration and to respond to corresponding humanitarian challenges through focused application of every Constitutional and statutory authority at our disposal. It has also facilitated the military's ongoing construction of virtually insurmountable physical barriers along hundreds of miles of our southern border.

The southern border, however, continues to be a major entry point for criminals, gang members, and illicit narcotics to come into our country. As explained in Proclamation 9844, in my veto message regarding H.J. Res. 46, and in congressional testimony from

multiple Administration officials, the ongoing crisis at the southern border threatens core national security interests. In addition, security challenges at the southern border exacerbate an ongoing humanitarian crisis that threatens the well-being of vulnerable populations, including women and children.

In short, the situation on our southern border remains a national emergency, and our Armed Forces are still needed to help confront it.

Like H.J. Res. 46, S.J. Res. 54 would undermine the Government's ability to address this continuing national emergency. It would, among other things, impair the Government's capacity to secure the Nation's southern borders against unlawful entry and to curb the trafficking and smuggling that fuels the present humanitarian crisis.

S.J. Res. 54 is also inconsistent with other recent congressional actions. For example, the Congress, in an overwhelmingly bipartisan manner, has provided emergency resources to address the crisis at the southern border. Additionally, the Congress has approved a budget framework that expressly preserves the emergency authorities my Administration is using to address the crisis.

Proclamation 9844 was neither a new nor novel application of executive authority. Rather, it is the sixtieth Presidential invocation of the National Emergencies Act of 1976. It relies upon the same statutory authority used by both of the previous two Presidents to undertake more than 18 different military construction projects from 2001 through 2013. And it has withstood judicial challenge in the Supreme Court.

Earlier this year, I vetoed H.J. Res. 46 because it was a dangerous resolution that would undermine United States sovereignty and threaten the lives and safety of countless Americans. It was, therefore, my duty to return it to the House of Representatives without my approval. It is similarly my duty, in order to protect the safety and security of our Nation, to return S.J. Res. 54 to the Senate without my approval.

DONALD J. TRUMP

THE WHITE HOUSE,

October 15, 2019.

# **EXHIBIT 5**



DEPUTY SECRETARY OF DEFENSE  
1010 DEFENSE PENTAGON  
WASHINGTON, DC 20301-1010

4 DEC 2001

MEMORANDUM FOR SECRETARY OF THE ARMY

SUBJECT: Emergency Construction Authority to Reduce the Risk from Terrorist  
Attacks on Weapons of Mass Destruction Stockpiles at Various Installations

Pursuant to the National Emergencies Act, 50 U.S.C. 1601 *et seq.*, the President has signed an Executive Order, dated November 16, 2001, invoking the emergency construction authority of 10 U.S.C. 2808 to approve military construction projects not otherwise authorized by law.

In accordance with that authority, I approve the Department of the Army's request for authority to carry out certain emergency construction projects at various installations.

The use of the Army Materiel Command to accomplish the subject emergency construction, pursuant to 10 U.S.C. 2851, "Supervision of military construction projects," is approved.

A handwritten signature in black ink, reading "Paul W. Fawcett", is located in the lower right quadrant of the page. The signature is written in a cursive style with a large, looping "F".



U18884 /01

1. COMPONENT ARMY		FY 2002 MILITARY CONSTRUCTION PROJECT DATA		2. DATE 10 OCT 2001	
3. INSTALLATION AND LOCATION US Various Locations US Various			4. PROJECT TITLE Security Measures for WMD		
5. PROGRAM ELEMENT	6. CATEGORY CODE 872	7. PROJECT NUMBER 57747	8. PROJECT COST (\$000) Auth 35,000 Approp		
9. COST ESTIMATES					
ITEM		U/M	QUANTITY		
<u>PRIMARY FACILITY</u>					
Sec Measures-Pine Bluff Ars, AR		LS	--	--	30,500 (4,000)
Sec Measures-Newport CD, IN		LS	--	--	(9,400)
Sec Measures-Bluegrass AD, KY		LS	--	--	(1,400)
Sec Measures-Aberdeen PG, MD		LS	--	--	(10,000)
Sec Measures-Umatilla AD, OR		LS	--	--	(5,700)
<u>SUPPORTING FACILITIES</u>					
ESTIMATED CONTRACT COST					30,500
CONTINGENCY PERCENT (5.00%)					1,525
SUBTOTAL					32,025
SUPERVISION, INSPECTION & OVERHEAD (5.70%)					1,825
DESIGN/BUILD - DESIGN COST					1,150
TOTAL REQUEST					35,000
TOTAL REQUEST (ROUNDED)					35,000
INSTALLED EQT-OTHER APPROPRIATIONS					(0)
10. Description of Proposed Construction Construct security measures at Pine Bluff Arsenal, Arkansas; Newport Chemical Depot, Indiana; Bluegrass Army Depot, Kentucky; Aberdeen Proving Ground, Maryland; and Umatilla Army Depot, Oregon. These security measures will safeguard existing stockpiles of weapons of mass destruction (WMD), and will include such items as security fencing, gates, protective barriers, guard buildings, access roads, exterior lighting, storage igloos, and intrusion detection systems (installation only).					
11. REQ: 1 EA ADQT: NONE SUBSTD: NONE					
PROJECT: Construct emergency security measures for weapons of mass destruction at various US locations pursuant to 10 USC 2808.					
REQUIREMENT: US WMD stockpile locations need a higher level of security to prevent attack and incursion.					
CURRENT SITUATION: A recent security assessment has validated an immediate need for increased security measures at Army installations in the US with WMD stockpiles.					
IMPACT IF NOT PROVIDED: If this project is not provided, weapons of mass destruction stockpiles will remain at an increased risk of attack and incursion.					

Encl 1

# **EXHIBIT 6**

DECLARATION OF ALEX A. BEEHLER

I, ALEX A. BEEHLER, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the Assistant Secretary of the United States Army (Installations, Energy and Environment). Among other duties, which are generally reflected in General Order No. 2019-01 "Assignment of Functions and Responsibilities Within Headquarters, Department of the Army," I am responsible for developing and overseeing policies and programs regarding military construction, management of real property and installations, real estate contracting, environmental compliance and conservation, and oversight of all execution functions performed by the U.S. Army Corps of Engineers (USACE) related to the Army's military construction, real property, real estate, and environmental programs.
2. This declaration is based on my personal knowledge and information made available to me in the course of my official duties.

*Section 2808 Project Locations*

3. On September 3, 2019, pursuant to the memorandum, "Guidance for Undertaking Military Construction Projects Pursuant to Section 2808 of Title 10, U.S. Code," the Secretary of Defense directed the then-Acting Secretary of the Army to undertake expeditiously eleven border barrier military construction projects as authorized by 10 U.S.C. § 2808. As previously described in the fifth declaration of Kenneth Rapuano, these eleven border barrier military construction projects are San Diego 4, San Diego 11, El Centro 5, El Centro 9, Yuma 6, Yuma 2, Yuma 10/27, Yuma 3, El Paso 8, El Paso 2, and Laredo 7.
4. The projects approved by the Secretary of Defense include a combination of primary and secondary pedestrian barrier. I have been informed by USACE that primary barrier projects include the barrier, lighting (including power to supply the lighting), fiber optic detection cable, and a patrol road on the north side of the barrier. Secondary barrier projects include only the barrier. Both primary and secondary pedestrian barrier will generally be a 30 ft. bollard barrier, with bollards at four-inch intervals. There may be certain projects where, based on site conditions and other factors, the bollard barrier may be 18 ft. For projects where there is an existing patrol road, those roads may be improved by laying four inches of gravel and a concrete surface if the grade exceeds 15% or crosses water.
5. I am further informed by USACE that primary fence construction projects require a 60-foot-wide construction area from the border. Secondary fencing requires a 150 foot-wide construction area.
6. USACE has produced a map for all Section 2808 projects that is included at Attachment 1. The following project-specific information is informed, in part, by information made available to me by U.S. Customs and Border Protection (CBP):

#### San Diego 4

7. The San Diego 4 project will involve the construction of 1.5 miles of new primary pedestrian barrier and 2 miles of new secondary pedestrian barrier. The San Diego 4 project area is in San Diego County, California. It starts 3.6 miles east of the Otay Mesa Port of Entry and extends east for 2 miles.
8. There is no existing barrier along the 1.5 mile segment of the international border where USACE will construct the primary pedestrian barrier portion of the San Diego 4 project. The new primary pedestrian barrier will fill a gap between segments of existing primary pedestrian barrier.
9. The new secondary barrier will run parallel to and be situated north of the 1.5 miles of new primary pedestrian barrier that will be constructed as a part of the San Diego 4 project and then extend east for an additional one-half mile, where it will run parallel to and be situated north of an existing 18-foot bollard-style primary pedestrian barrier.
10. There are existing patrol roads primarily in the eastern portion of the San Diego 4 project area. Given the terrain, the existing patrol roads run parallel to, but are not always situated directly adjacent to, the international border.

#### San Diego 11

11. The San Diego 11 project will involve the construction of approximately three miles of new secondary pedestrian barrier, which will span both sides of the Tecate Port of Entry. The San Diego 11 project area is in San Diego County, California. It starts 2 miles west of the Tecate Port of Entry and extends east to 1.5 miles east of the Tecate Port of Entry.
12. Within the San Diego 11 project area there is an existing 10-foot landing-mat-style primary pedestrian barrier, which consists of panels of corrugated steel that are welded or attached to metal posts. There is also a patrol road situated immediately north of the primary pedestrian barrier and mobile light stands have been deployed in the area. As a part of a separate fence replacement project, CBP is currently replacing the existing landing mat barrier with 30-foot bollard-style pedestrian barrier and improving the existing patrol road. The new secondary pedestrian barrier that will be constructed as a part of the San Diego 11 project will be situated north of—and run parallel to—the existing primary pedestrian barrier and patrol road.
13. On the U.S. side of the border, the areas immediately adjacent to the Tecate Port of Entry are developed and urbanized. Similarly, on the Mexican side of the border, the areas that surround San Diego 11 project area are urbanized and appear to be densely-populated.

#### El Centro 5

14. The El Centro 5 project will involve the construction of approximately 1 mile of new secondary pedestrian barrier that will span both sides of the Calexico West Port of Entry.

The El Centro 5 project area is in Imperial County, California. It starts approximately .5 miles west of the Calexico West Port of Entry and extends east to approximately 1 mile east of the Calexico West Port of Entry.

15. Within the El Centro 5 project area there is 30-foot bollard-style primary pedestrian barrier. There is an existing patrol road that is situated immediately north of the existing pedestrian barrier. There are also lighting and cameras. The new secondary pedestrian barrier that will be constructed as a part of the El Centro 5 project will be situated north of the existing primary pedestrian barrier and patrol road.
16. For the entire length of the El Centro 5 project area, the areas that surround the project area on both sides of the international border are urbanized, heavily developed, and appear to be densely-populated, with the city of Calexico, California, on the U.S. side of the border and the city of Mexicali, Mexico, on the Mexican side of the border.

#### El Centro 9

17. The El Centro 9 project will involve the construction of approximately 12 miles of new secondary pedestrian barrier. The approximately 12 miles of new secondary pedestrian barrier will be built in two segments, which will be situated on either side of the El Centro 9 project area. The El Centro 9 project area is in Imperial County, California. To the west of the Calexico West Port of Entry, the El Centro 9 project area begins 1.5 miles west of Border Monument 223 and extends east to Border Monument 221, which abuts the western terminus of the El Centro 9 project area. To the east of the Calexico West Port of Entry, the El Centro 9 project area begins one mile east of the Calexico West Port of Entry at or near the eastern terminus of the El Centro 9 project area and extends east for approximately 3 miles.
18. Within the El Centro 9 project area there is a 30-foot bollard-style primary pedestrian barrier. There is a patrol road that is situated north of the primary pedestrian barrier. There are also lighting and cameras. The new secondary barrier that will be constructed as a part of the El Centro 9 project will be situated north of the primary pedestrian barrier and patrol road.
19. On the U.S. side of the border, the areas that surround the El Centro 9 project area appear to be comprised primarily of privately owned land that is used for agricultural purposes. On the Mexican side of the border, the areas that surround the western portion of the El Centro 9 project are also comprised of land that appears to be used for agricultural purposes. In the eastern portion of the El Centro 9 project area, the Mexican side of the border is urbanized, heavily developed, and appears to be densely-populated.

#### Yuma 6

20. The Yuma 6 project will involve the construction of approximately 1 mile of new primary pedestrian barrier and construction of 2 miles of new secondary pedestrian barrier. The Yuma 6 project area is in Imperial County, California, and Yuma County, Arizona. It starts west of the Andrade Port of Entry one-half of a mile west of the Border Monument 208 and extends east to the Colorado River. It then resumes on the east side of the Colorado River

and extends south for approximately one mile. Approximately 0.2 miles of primary barrier and 1.5 miles of secondary barrier will be built California.

21. Within the Yuma 6 project area there is existing border infrastructure. In the portions of the project area that are situated west of the Andrade Port of Entry, there is an existing primary pedestrian barrier and patrol road that is situated immediately north of the primary pedestrian barrier. There is a mix of existing primary pedestrian barrier west of the Andrade Port of Entry. Near the Andrade Port of Entry, the existing pedestrian barrier is a 10-foot landing-mat barrier. Further west, the existing primary pedestrian barrier is an 18-foot bollard-style barrier. In the area that is immediately adjacent to the Andrade Port of Entry and extends east to the Alamo Canal, there is no existing barrier. A portion of the new primary pedestrian barrier that will be constructed as a part of the Yuma 6 project will fill this gap. East of the Andrade Port of Entry, between the Alamo Canal and the Colorado River, there is a 10-foot landing mat-style primary pedestrian barrier. The remaining portion of new primary pedestrian barrier that will be constructed as a part of the Yuma 6 project will be situated east of the Colorado River, where there is currently no primary pedestrian barrier. The new secondary barrier that will be constructed as a part of the Yuma 6 project will be situated behind the primary pedestrian barrier and patrol road.

#### Yuma 2

22. The Yuma 2 project will involve the replacement of approximately two miles of existing fencing with new primary pedestrian barrier. The Yuma 2 project area is in Yuma County, Arizona, on the Barry M. Goldwater Range (BMGR). It starts 2.5 miles west of Border Monument 198 and extends east to Border Monument 197.
23. The existing pedestrian barrier that will be replaced as a part of the Yuma 2 project is a 12-foot bollard and mesh-style fencing. There is also an existing patrol road that is situated north of the existing pedestrian barrier.

#### Yuma 10/27

24. The Yuma 10/27 project will involve the construction of approximately 31 miles of new secondary pedestrian barrier on the BMGR. The Yuma 10/27 project area is in Yuma County, Arizona. It starts near the western boundary of the BMGR and extends 31 miles east to the base of the Tinajas Atlas Mountains near the eastern boundary of the BMGR.
25. There is an existing primary pedestrian barrier within the project area. From the western boundary of BMGR to approximately 2.5 miles east of Border Monument 198, the existing 12-foot bollard and mesh-style fencing is being replaced with 30-foot bollard-style barrier by CBP as a part of a separate fence replacement project. As noted above, from 2.5 miles east of Border Monument 198 to Border Monument 197, as a part of the Yuma 2 project, USACE will be replacing the existing 12-foot bollard and mesh-style fencing with new primary pedestrian barrier. There is also an existing patrol road that is situated immediately north of the existing primary pedestrian barrier. The new secondary pedestrian barrier that will be

constructed as a part of the Yuma 10/27 project will be situated north of the pedestrian barrier and patrol road.

### Yuma 3

26. The Yuma 3 project will involve the replacement of 31 miles of vehicle barrier with new primary pedestrian barrier. The Yuma 3 project area is in Yuma County, Arizona. It begins approximately .4 miles east of the eastern boundary of the BMGR and extends east for 31 miles on or adjacent to the Cabeza Prieta National Wildlife Refuge (Cabeza Prieta) to the Yuma County and Pima County line.
27. There is existing post and rail-style vehicle barrier within the Yuma 3 project area, which, as noted above, will be replaced with primary pedestrian barrier as a part of the Yuma 3 project. There is also an existing patrol road that is situated immediately north of the existing vehicle barrier in most of the project area.

### El Paso 8

28. The El Paso 8 project will involve the replacement of approximately 6 miles of existing vehicle barrier with primary pedestrian barrier and the construction of approximately 6 miles of new secondary pedestrian barrier. The El Paso 8 project area is in Hidalgo County, New Mexico. It starts 1.5 miles west of Border Monument 64 and extends to 2 miles east of Border Monument 63.
29. Within the El Paso 8 project area there is existing Normandy-style vehicle barrier, which will be replaced with primary pedestrian barrier as a part of the El Paso 8 project. In addition, there is an existing patrol road that is situated immediately north of the existing vehicle barrier. The new secondary barrier will be north of the new primary pedestrian barrier and the existing patrol road.

### El Paso 2

30. The El Paso 2 project will involve replacing 23.51 miles of existing vehicle barrier with primary pedestrian barrier in three noncontiguous segments. The El Paso 2 project area is in Hidalgo and Luna Counties, New Mexico. The first two segments of the El Paso 2 project area are in Hidalgo County, New Mexico. The first segment starts approximately 5.1 miles east of the Arizona-New Mexico Border and extends east for approximately 4.5 miles. The second segment starts approximately 3 miles west of the Antelope Wells Port of Entry and extends to approximately 3 miles east of the Antelope Wells Port of Entry. The third segment is in Luna County, New Mexico. It starts approximately 20 miles west of the Columbus Port of Entry and extends west for approximately 12.84 miles.
31. There is existing Normandy-style vehicle barrier within the El Paso 2 project area, which will be replaced with primary pedestrian barrier. There is also an existing patrol road that is situated immediately north of the existing pedestrian barrier.

Laredo 7

32. Laredo Project 7 involves the construction of approximately 52 miles of new primary pedestrian barrier. The Laredo 7 project area is in Webb County, Texas. It starts at the Laredo-Columbia Solidarity Port of Entry Northwest, and extends north along the Rio Grande River for approximately 52 miles.

*USACE Environmental Planning and Mitigation Efforts*

Construction Best Management Practices (BMPs)

33. For all Section 2808 projects, USACE intends to include construction BMPs previously prepared by CBP for work in the CBP sectors containing Section 2808 projects in order to minimize or avoid to the extent practicable potential environmental impacts.
34. I am informed by USACE that construction BMPs address general construction activities, biological resources, air quality, water resources, and cultural resources. For example, construction BMPs developed for the Yuma Sector have already been included in the first Requests for Proposal for the Yuma 2 and Yuma 10/27 construction contracts. These BMPs include, but are not limited to: (i) using established roads to the maximum extent practicable and using areas already disturbed by past activities, when available, for staging, parking and equipment storage; (ii) limiting the application of soil-binding agents to areas that lack vegetation or are not in or near (i.e., within 100 feet of) surface waters and to months in late summer or early fall to avoid affecting Federally listed species; (iii) washing hauling and construction equipment entering the site to prevent the introduction of invasive species, removing plant/vegetation and soil/debris from construction vehicles leaving the site, to prevent the removal of invasive species from the site and using vegetation removal methods that allow root systems to remain intact to prevent disturbance that encourages establishment of invasive plant species; (iv) prohibiting the use of herbicides in streams or other bodies of water, and areas suitable for or designated as critical habitat of threatened or endangered plant species; and (v) requiring that treated water from outside the immediate construction area be used if pumping local groundwater has an adverse effect on the aquatic, marsh, or riparian dwelling of threatened or endangered species.
35. USACE will provide for on-site environmental monitors during construction to ensure that contractors adhere to the BMPs.

USACE Environmental Support Teams (ENVst)

36. In addition, I am informed that USACE ENVst are conducting and will continue to conduct Environmental Baseline Surveys (EBS) prior to construction of Section 2808 projects. EBS reports will identify, to the extent possible, potential impacts from construction activities and measures to avoid or minimize impacts to environmentally sensitive resources that could be undertaken without impeding expeditious construction of Section 2808 projects. In preparing these reports, USACE may also informally coordinate with other Federal and State agencies,

Federally recognized Indian Tribes, and other stakeholders that may have information relevant to the EBS. The completed EBS reports will be provided to construction personnel.

37. ENVst teams include USACE chemists, environmental engineers, biologists, explosive specialists, engineering technicians, and environmental specialists.
38. I am further informed by USACE that ENVst are currently conducting the first outreach meetings with resource agencies (e.g., land management agencies, U.S. Fish and Wildlife Service (USFWS), State resource agencies, and local Tribal governments). The input from these outreach meetings will inform additional outreach and other environmental measures that the Department of the Army and USACE may consider implementing. These environmental measures may include identifying sensitive areas to be avoided during construction, minimizing impacts to sensitive species, and additional construction BMPs for Section 2808 construction contracts. The Department of the Army and USACE may also develop mitigation measures, in coordination with the resource agencies, which may include small wildlife passages (SWPs), data recovery for archeological or cultural resource sites, restoration of adjacent areas, and adjusting the project footprint. Data recovery for archeological or cultural resource sites may include hiring a consultant to measure the site, photograph the site, and recover items to be catalogued off-site in a museum setting. Adjusting the project footprint may include such actions as designing a bend in a patrol road to avoid a cactus.
39. USACE will develop environmental documentation regarding additional measures undertaken during construction, which will include consideration of pre-construction site conditions, construction impacts, and any mitigation measures that USACE implements.

#### Biological Resources

40. I am informed by USACE that, before any ground-disturbing activities or vegetation removal or trimming begins, a biologist (either employed by USACE or contracted by USACE) will present an environmental awareness program to all personnel who will be on-site. The presentation will include, at a minimum, information regarding migratory bird species, the Sonoran pronghorn, the Acuña cactus, the northern jaguar, the Sonoran desert tortoise, the desert bighorn sheep, the golden eagle, the burrowing owl, the chuckwalla, and the flat-tailed horned lizard. This presentation will include general identification information for the species, a description of species habitat, and the sensitivity of the species to human activity, and will describe measures for avoiding and protecting the species during construction. Following this presentation, photographs of each species will be posted in the office of the contractor and resident engineer, where the photographs will remain for the duration of the construction project. The contractor is responsible for ensuring that employees are aware of the listed species.
41. These presentations for contractors involved in construction and maintenance of facilities will also include information regarding the protection of cacti and preservation of a suitable habitat for cacti.

42. If construction or clearing activities are scheduled to take place during nesting season (typically March 1 through September 1), USACE, either directly or through a contracted environmental firm, will perform a preconstruction survey for migratory bird species to identify active nests prior to the start of any construction or clearing activity. If construction activities will result in the disturbance or harm of a migratory bird, then USACE will coordinate with the USFWS and relevant State departments of natural resources. A buffer zone, designed in consultation with USFWS and shaped by the birds' characteristics, may be established around active nests until nestlings have fledged and abandoned the nest.
43. USACE will also ensure that construction areas that are hydro-seeded for temporary erosion-control measures only be native plant species appropriate to the surrounding habitat.
44. Additionally, USACE will ensure that removal of trees and brush in habitats for Federally listed species will be limited to the smallest amount needed to meet contract requirements.
45. USACE requires contractors to stop work and notify the USACE contracting officer when a Federally listed species is found in a project area. Any species of concern, including but not limited to the Sonoran pronghorn, the northern jaguar, the Sonoran desert tortoise, the golden eagle, the desert bighorn sheep, the burrowing owl, and the flat-tailed horned lizard, must not be harmed, harassed, or disturbed. Work may resume when a biologist safely removes the animal or the animal moves away on its own. A biologist will relocate any Federally listed species found in the project areas that require relocation.
46. USACE requires all on-site workers to check under their parked vehicles and equipment prior to driving to see whether there is a Sonoran desert tortoise sheltering underneath the vehicle or equipment. If a desert tortoise is found sheltering underneath a parked vehicle or equipment, the desert tortoise must be allowed to move out from under the vehicle or equipment on its own or a biologist must be contacted to relocate the animal before the vehicle or equipment can be moved. Any biologist-facilitated relocation will adhere to current handling guidelines for the Sonoran desert tortoise issued by the Arizona Game and Fish Department, Revised September 2014.
47. USACE will provide contractors with the Flat-tailed Horned Lizard Rangewide Management Strategy, which includes mitigation measures to minimize impacts to the lizards and their habitat.
48. USACE requires contractors to design light poles and other pole-like structures to discourage roosting by birds, particularly ravens and raptors.
49. To prevent entrapment of wildlife species during construction, all excavated, steep-walled holes or trenches more than 2 feet deep must be covered at the close of each working day by plywood or installed with one or more escape ramps constructed of dirt fill or wooden planks. The ramps will be located at no greater than 1,000-foot intervals and will be sloped less than 45 degrees. Each morning before the start of construction, and before such holes or trenches are filled, contractors must thoroughly inspect any holes or trenches for trapped animals. Any animals discovered must be allowed to escape voluntarily (by escape ramps or

temporary structures) and without harassment, or be removed from the trench or hole by a biologist before construction activities resume.

50. To prevent entrapment of wildlife during construction, all hollow vertical bollards must be covered. Contractors must also use covers from the time the bollards are erected to the time they are filled.
51. To prevent attracting predators of protected animals, all trash related to food—e.g., wrappers, cans, bottles, and food scraps—must be disposed of in closed containers and removed daily from the project sites.
52. USACE is also implementing general construction requirements related to clearing, grubbing, and plant relocation to mitigate adverse environmental impacts. For example, contractors will be required to protect the Saguaro cactus “in place.” For Yuma 2 and Yuma 10/27, if a Saguaro cactus interferes with construction operations, contractors must relocate the cactus if it is less than ten feet tall. The government has identified 200 Saguaro cacti of various sizes located within the Yuma 2 and Yuma 10/27 project boundaries. For Yuma 3, if Saguaro cacti interfere with construction operations, they are to be relocated in accordance with ¶53 of this declaration. The government has identified approximately 45 Saguaro cacti of various sizes located within the Yuma 3 project boundaries. In all cases, USACE will attempt to relocate cacti as long as they are viable. USACE will develop further specific criteria as it formulates subsequent requests for proposal.
53. When relocating plants, including the Saguaro cactus, contractors will provide a licensed arborist or biologist to prepare a relocation plan and oversee the relocation effort. Affected plants are to be relocated to undisturbed areas at least 10 feet away from proposed lighting and electrical features. Contractors will submit a plant relocation plan, indicating existing and proposed locations for plants to be relocated, to the USACE contracting officer. The plant relocation plan will include: (i) the method of removal and placement; (ii) procedures for fertilizing and watering the plant; (iii) methods for bracing and stabilizing the plant; (iv) provisions for marking relocated plants so that they will be identifiable during the 12-month period required for the plant to establish roots in the new soil; and (v) proposed locations for electrical components, lighting, and fiber optic features.
54. As noted in ¶61 of the April 25, 2019 Enriquez declaration, the conversion from wire mesh fencing to bollard barrier fencing will have beneficial impacts for some smaller species, including the flat-tailed horned lizard. For prior projects where CBP constructed mesh-style fencing, CBP incorporated small holes in the bottom of the fence that would allow for migration of smaller species, such as the flat-tailed horned lizard. The bollard fencing will not require these holes because smaller species will be able to travel through the four-inch gaps between bollards.

#### Air Quality

55. USACE requires contractors to water the soil to minimize airborne particulate matter created from construction activities and to cover bare ground with erosion protection following

construction. Mitigation measures will be incorporated to ensure that PM10 emission levels do not rise above the de minimus threshold required in 40 CFR 51.853(b)(1). These measures include dust suppression methods to minimize airborne particulate matter that will be created during construction activities. Standard construction BMPs, such as routine watering of the patrol, drag, and access roads, will be used to control dust during construction. Additionally, all construction equipment and vehicles will be kept in good operating condition to minimize exhaust emissions.

#### Water Resources

56. USACE requires contractors to implement standard construction procedures to minimize the potential for erosion and sedimentation during construction. For example, contractors must minimize or avoid the potential for trapping surface water flows within the roadbed caused by grading. The specific procedures implemented by contractors will differ depending on the project location and contractor design submissions. In past, similar projects, contractors have employed drainage ditches and check dams to control erosion. The depth of any pits created must also be minimized so animals do not become trapped. Water tankers that convey untreated surface water must not discard unused water where it has the potential to enter surface waters or drainages. The contractor's environmental monitor, a USACE-contracted environmental monitor, or representative from USACE will advise as to appropriate sites for discarding unused water. If untreated surface water is used, all pumps, hoses, tanks, and other water storage devices must be cleaned and disinfected with a 10% bleach solution at an appropriate facility before the equipment is employed at another site. This 10% bleach solution must not enter any surface water area. If a new water source is used that is not from a treated or groundwater source, additional cleaning is required to kill any residual disease-carrying organisms or invasive species that may affect local threatened or endangered species.
57. Materials used for on-site erosion control in native habitats must be free of non-native plant seeds and other plant parts to limit the potential for infestation by non-native species. Since natural materials cannot be certified as completely weed-free, if natural materials are used for erosion control, there must be follow-up monitoring to document whether non-native species have been inadvertently planted and whether appropriate, time-bound control measures should be implemented in the site restoration plan.

#### Cultural Resources

58. I am informed that any known cultural resources will be clearly flagged by USACE environmental monitors for avoidance during construction. Flagging must be completed before any ground disturbing activities take place. If it is not practicable to avoid such sites and there may be impacts to known cultural resources, USACE may be required to undertake other data recovery efforts before beginning any ground disturbing activities. Should any hitherto unknown archaeological artifacts or human remains be found during construction, all ground disturbing activities in the vicinity of the discovery must stop and the contractor must immediately notify the USACE Contracting Officer. Work will not resume until it is authorized by the USACE contracting officer.

*Harm to Wildlife and Other Natural Resources in California and New Mexico*

59. I have been informed by USFWS that statements made in the declaration of Paul Enriquez, dated April 25, 2019, regarding threatened and endangered species are still accurate. Additional information from USFWS and USACE regarding allegations found in the Plaintiffs' Motion for Summary Judgment and accompanying declarations are as follows:

Chiricahua Leopard Frog

60. I am informed by USFWS that there is no USFWS designated critical habitat for the Chiricahua leopard frog in the project areas, and so no critical habitat will be lost. I am also informed by USFWS that critical habitat for the Chiricahua leopard frog does not cross the international border and, as stated above, the bollard barrier will allow small species to traverse the border. For these reasons, the plaintiff's alleged harms concerning the Chiricahua leopard frog are misplaced.

Gila Monster

61. USFWS has provided the following additional information on the expected effect of Section 2808 construction on Gila monsters in New Mexico. This information corresponds to ¶¶ 58 and 59 of the Enriquez declaration:
- a. Records of Gila monsters in the counties of Dona Ana, New Mexico, and Luna, New Mexico, are exceedingly rare and outside the range where most State records document the presence of Gila monsters.
  - b. Indirect effects to Gila monsters caused by the presence of border barriers, such as limiting their movement patterns, are not expected based on the size and physical abilities of Gila monsters compared to potential restrictions associated with proposed bollard fencing.
  - c. Gila monsters are expected to occur in various densities along the Yuma Projects, particularly where habitat complexity and vegetation heterogeneity are higher and where rock structures or subsurface retreats are common. Specifically, in the Lower Colorado subdivision of Sonoran Desertscrub where the Yuma projects occur, Gila monsters are more frequently encountered between the creosote bush-white bursage series and the paloverde-cactus of the Arizona upland, where topographical relief tends to be greater. Since such topography is less common in the Yuma project areas, there are fewer expected impacts to Gila monsters.
  - d. I am informed that, for the foregoing reasons, in the region that includes the Yuma Projects, and particularly where mountain ranges intersect with the international border, the potential for loss of an unknown number of individual Gila monsters as a result of construction activity, would not have an appreciable effect on the larger, contiguous population of Gila monsters.

Burrowing Owl

62. USACE advises that the construction BMPs used for Yuma 2 and Yuma 10/27 Requests for Proposal include provisions requiring that burrowing owl surveys be conducted 30 days

before any construction begins in burrowing owl areas; active burrows be flagged and include a 250-foot buffer; and active burrows that cannot be avoided be collapsed. There are two restrictions on whether contractors may collapse a burrow. If construction is taking place during the owl's nesting period, which lasts from February 15 through September 15, contractors will first ascertain whether there are eggs or young in the burrow before a burrow is collapsed, consistent with guidelines developed by the Burrowing Owl Consortium of California. See Attachment 2. If young are present, burrows will not be collapsed until they fledge.

#### Flat-Tailed Horned Lizard

63. USACE has advised me that the contractors for Yuma 2 and Yuma 10/27 are required to comply with the mitigation and compensation measures identified in the Flat-tailed Horned Lizard Rangewide Management Strategy (Flat-tailed Horned Lizard Interagency Coordinating Committee. 2003, pp. 58-62). In addition, the Requests for Proposal for Yuma 2 and Yuma 10/27 include construction BMPs specific to the flat-tailed horned lizard, among other construction BMPs. These construction BMPs require that:

- a. All on-site personnel must attend a worker awareness presentation given by a biologist that holds a letter of completion for attending the flat-tailed horned lizard biomonitor training, prior to conducting any construction activity in the Yuma Desert Management Area;
- b. A biologist will be present during construction activities. The biologist will oversee compliance with protective measures for the flat-tailed horned lizard and serve as the primary field contact for matters related to the flat-tailed horned lizard. The biologist is responsible for telling the construction supervisor to halt activities that violate the mitigation terms and conditions;
- c. A biologist must be present to monitor any ground-disturbing construction activities. The biologist will survey the work area before ground clearing to locate and remove any flat-tailed horned lizards present in the active work area; and
- d. A biologist must inspect areas that will be disturbed by construction activities before any such activities take place and relocate any flat-tailed horned lizards, in danger of being injured or killed. The biologist must also inspect all excavations for flat-tailed horned lizards before backfilling any excavated land and relocate any such animals found during excavation, provided that such an inspection is safe and practical. Any land that is left excavated overnight must be covered or have an escape ramp installed to prevent entrapment of the flat-tailed horned lizard. The biologist will inspect for flat-tailed horned lizards under all equipment that has remained idle for 15 minutes or more prior to moving the equipment.

#### Northern Jaguar

64. As conceded in the States' Summary Judgment brief, Section 2808 projects are only "adjacent" to a northern jaguar critical habitat in New Mexico. According to the USFWS, passage across the international border in Arizona will still be possible notwithstanding Section 2808 construction. USFWS defines a critical habitat as those areas that contain the

physical and biological features essential to the conservation of a species. Critical habitat is generally limited to those areas that are either occupied by the species or those areas outside the geographic area occupied by the species that are essential to the conservation of the species. According to USFWS' critical habitat designation, there have only been seven individual jaguars detected in the United States since 1982, with all of them occurring in areas where critical habitat has been designated. Further, the most recent known breeding event in the United States, according to USFWS, was in 1910. Thus, the States' assertion that the New Mexico project will "bisect" a jaguar migration corridor (States' SJ Brief at 30) is exaggerated. In light of the above, the evidence does not support plaintiffs' suggestion or assertion that the Yuma and El Paso Projects will significantly harm the jaguar population or jaguar recovery in the United States.

#### White-Sided Jackrabbit

65. The white-sided jackrabbit population crosses the border at the Animas Valley. Plaintiffs claim that the species will be harmed by construction of border barrier at El Paso 2 and El Paso 8. I am informed that the segment of El Paso 2 between monuments 67 and 69 is on the west side of the Animas Valley. Additionally, the east side of the Animas Valley is not included in El Paso Project 8. Furthermore, USFWS declined to list the jackrabbit or any of its subspecies or populations as threatened or endangered and to designate critical habitat under the Endangered Species Act. 75 Fed. Reg. 53615 (Sept. 1, 2010). USFWS rejected the assertion that impacts with Border Security vehicles was a cause of the species' decline. *Id.* at 53623-24. In declining to list the United States populations of the jackrabbit as threatened or endangered, USFWS also determined that the portion of the jackrabbit population in the United States "represent[s] less than one percent of the range of the species," that the United States populations "are peripheral populations occurring in an area where the species was never known to be abundant," and that "[t]he loss of these populations is not likely to result in a significant gap in the range of the taxon." *Id.* at 53628.

#### Mexican Wolf and Aplomado Falcon

66. Plaintiffs claim that, "[t]he New Mexico Projects will bisect important wildlife habitats, impairing the access of the Mexican Wolf and other endangered species to those habitats. *Id.* Ex. 4 (Nagano Decl. ¶ 25); Ex. 5 (Traphagen Decl. ¶¶ 18-19, 23-24)." States SJ Brief at 25. More generally, plaintiffs also assert that there are credible threats to the Aplomado falcon. Nagano ¶ 13-34; Vanderplank ¶ 20-22.

67. There is insufficient evidence to support the suggestion that Section 2808 projects will significantly harm the population or recovery of the Mexican wolf or Aplomado falcon. As stated in ¶55 of the Enriquez declaration, the recovery criteria for Mexican wolf specifically contemplates "two demographically and environmentally independent populations," one in the United States and one in Mexico, "such that negative events (e.g. diseases, severe weather, natural disasters) are unlikely to affect both populations simultaneously." *Id.* According to USFWS, having two resilient populations provides redundancy, which in turn provides security against extinction from catastrophic events that could affect a population. Recovery criteria also call for achieving a specific genetic target to ensure that genetic threats

are adequately alleviated. USFWS recognizes the benefits of connectivity (wolves naturally dispersing between populations) to improve genetic diversity, but has also stated that it “do[es] not expect the level of dispersal predicted between any of the sites (particularly between the United States and northern Sierra Madre Occidental) to provide for adequate gene flow between populations to alleviate genetic threats or ensure representation of the captive population’s gene diversity in both populations.” *Id.* Therefore, USFWS crafted a recovery strategy for the Mexican wolf that relies on the initial release of wolves from captivity to the wild and the translocation of wolves between populations as a necessary form of management to alleviate genetic threats during the recovery process. *Id.* USFWS specifically stated that “connectivity or successful migrants are not required to achieve recovery” of the Mexican wolf. *Id.* at 15.

68. Similarly, according to USFWS, Aplomado falcon pairs likely number into the hundreds and are distributed among three populations and four countries. The Simpson Draw pair likely account for less than 1% of Aplomado falcons. Therefore, I am informed that, even if the proposed construction resulted in the loss of one pair, it is not likely to significantly reduce the subspecies’ survival or recovery probabilities. Further, as stated at ¶57 of the Enriquez declaration, USFWS has not designated any critical habitat for the Aplomado falcon because there is ample suitable habitat to support falcons in Arizona and New Mexico. Similarly, USFWS has not designated any critical habitat for Mexican wolf.

#### Mule Deer, Mountain Lion, and Bighorn Sheep

69. The States’ allege that the Section 2808 projects in New Mexico “will completely block habitat corridors for [mule deer, mountain lions, and bighorn sheep] and impair New Mexico’s ability to protect these important corridors.” States’ SJ Brief at 25. As stated at ¶61 of the Enriquez declaration, these assertions are directly at odds with CBP’s prior analysis of similar projects, including the recent Santa Teresa project. In the Santa Teresa project, CBP concluded that such construction would result only in minor adverse effects to wildlife.

#### Quino Checkerspot Butterfly, California Gnatcatcher, and Vernal Pool Species

70. Neither the Clark nor the Gibson declarations identifies any members of these species that have been found in the Section 2808 project areas. As stated above, USACE will complete EBS reports that will identify, to the extent possible, potential impacts from construction activities and measures to avoid or minimize impacts to environmentally sensitive resources that could be undertaken without impeding expeditious construction of Section 2808 projects.

#### *Recreational and Aesthetic Harms*

#### San Diego 4

71. The San Diego 4 project area is undeveloped, mountainous, and is situated south of the Otay Mountain Wilderness Area.
- a. *Sierra Club – Guerrero Declaration*

- i. Guerrero claims to visit the Otay Open Space Preserve once a month. (§ 5) The Otay Open Space Preserve is at least three miles north of the San Diego 4 project area. Therefore, San Diego 4 is unlikely to affect Guerrero's recreational or aesthetic experience in the Area.
- ii. Guerrero claims that construction would add a destructive human element to a peaceful desert landscape. (§ 6) As noted in §10 of this declaration, there are already roads in the construction area, and CBP patrols the region regularly. In addition, there is existing primary pedestrian barrier in the eastern portion of the San Diego 4 project area. Therefore, construction at San Diego 4 would not constitute an additional "destructive" human element and a more secure border barrier may actually reduce the need for other border enforcement activities in the area. Furthermore, the Otay Mountain Wilderness and surrounding undeveloped areas are large relative to the narrow construction corridor required for USACE activity.

b. *Sierra Club – Watman Declaration*

- i. Watman claims to hike in the Otay Mountain Wilderness frequently to "get away from hustle and bustle" and to lead tours in the wilderness (§§ 6-8). Watman further claims that construction would "block" his ability to enjoy the Wilderness (§ 12), thereby preventing further border tours, and ruin his sense of tranquility and being alone in nature (§ 13). These claims are exaggerated for the reasons stated above, i.e., there is existing infrastructure and CBP already patrols the area. Again, the surrounding protected and undeveloped areas are large when compared to the narrow construction corridor required for this project. The Otay Mountain Wilderness is approximately 18,500 acres, or approximately 26 square miles.

c. *Sierra Club – Wellhouse Declaration*

- i. Wellhouse also mentions the Otay Open Space Preserve and her concern that San Diego 4 could destroy habitat within the Area (§ 6). As discussed above, the Otay Open Space Preserve is at least three miles north of the San Diego 4 project area, and there will be no construction activities within the Area.
- ii. Wellhouse also claims that border barrier construction will severely impact her enjoyment of open spaces around the project area (§ 8). These claims are exaggerated for the reasons stated above.

San Diego 11

72. As stated above, the land on either side of the border at this location already appears to be heavily developed and urbanized.

a. *Sierra Club – Watman Declaration*

- i. Watman claims, among other things, that the secondary barrier will mar his views of the American mountain ranges when he visits Mexico (§ 18). As noted above, primary fence is already being replaced with 30-foot bollard fencing through a CBP replacement project. Therefore, the project area consists largely of previously disturbed land that already functions as a CBP law enforcement zone.

b. *Sierra Club – Wellhouse Declaration*

- i. Wellhouse claims that the construction will severely affect her enjoyment of open spaces around the project area (§ 8). This claim is exaggerated given the existing infrastructure, CBP patrols, and narrow construction corridor related to this project. Additionally, the San Diego 11 project area already functions as a law enforcement zone and most of land is already disturbed.

El Centro 5

73. As stated above, for the entire length of the El Centro 5 project area, the areas that surround the project area on both sides of the international border are urbanized, heavily developed, and appears to be densely-populated.

a. *Sierra Club – Ramirez Declaration*

- i. Ramirez claims that “Construction along the border will make me less likely to hike Mount Signal and enjoy outdoor recreational activities; and when I do undertake those activities, my enjoyment of them will be irreparably diminished. This additional barrier will further obstruct my sight line into Mexico.” (§ 5)
- ii. These claims are exaggerated because it is unclear how a secondary fence prohibits views of the mountains. Further, the area is already disturbed, functions as law enforcement zone, and is urbanized on both sides of the port of entry. El Centro 5 will not alter Ramirez’s ability to enter Mexico to hike Mount Signal—or return to the United States—through the Calexico port of entry.

El Centro 9

74. As described above, on the U.S. side of the border, the areas that surround the El Centro 9 project area appear to be comprised of primarily privately-owned land that is used for agricultural purposes. On the Mexican side of the border, the areas that surround the western portion of the El Centro 9 project are also comprised of land that appears to be agricultural land. In the eastern portion of the El Centro 9 project area, the Mexican side of the border is urbanized, densely-populated, and appears to be heavily developed.

a. *Sierra Club – Ramirez Declaration*

- i. Ramirez claims that “Construction along the border will make me less likely to hike Mount Signal and enjoy outdoor recreational activities; and when I do undertake those activities, my enjoyment of them will be irreparably diminished. This additional barrier will further obstruct my sight line into Mexico.” (¶ 5)
- ii. It is unclear how a secondary fence prohibits views of the mountains. Further, the area is already disturbed, functions as law enforcement zone, and is urbanized on both sides of the port of entry. An additional pedestrian fence in this urbanized landscape will not substantially alter the view. El Centro 9 will not alter Ramirez’s ability to enter Mexico to hike Mount Signal—or return to the United States—through the Calexico port of entry.

Yuma 6

*Sierra Club – Bevins Declaration*

75. Bevins claims that this project will fragment the vista in this area and disrupt desert views. He implies that, due to this project, he won’t be able to birdwatch or enjoy the natural features of the land. (¶¶ 7-8) Bevins further claims that the area is currently “not heavily fortified.” Id.
76. As noted above, there is already fencing near the project area. Thus, there is no basis to claim that the project will have significant aesthetic impacts. The new pedestrian fencing will be situated immediately adjacent to the Andrade port of entry and for approximately one mile along the Colorado River. Most of the new secondary fencing will be located behind existing fencing. This area already functions as a law enforcement zone and is mostly disturbed land.

*Sierra Club – Del Val Declaration*

77. Del Val is concerned that construction will detract from natural beauty. (¶ 7) Again, there is already significant existing infrastructure in the area, which Del Val admits by mentioning other wall projects. (¶ 8) The area also already functions as a law enforcement zone.

*Sierra Club – Meister Declaration*

78. Meister says that she feels uncomfortable that CBP watches her as she bird watches and that the Yuma 6 project could exacerbate the issue. (¶ 16) However, there is existing infrastructure in the project area. Further, the area is already functioning as a law enforcement zone, this is already a factor in her use of the area. USACE construction does nothing to change this dynamic.

Projects on BMGR (Yuma 2 and Yuma 10/27)

79. Management of BMGR is shared between the U.S. Air Force (BMGR East) and the U.S. Marine Corps (BMGR West). As shown in Figure 1.1 in the BMGR Integrated Natural Resource Management Plan (INRMP) (Attachment 3), the southernmost point of BMGR East is not near the U.S.-Mexico border.
80. The Department of the Navy has informed me that approximately 75 percent of BMGR West is made available to the public for recreational use, as shown in Figure 7.1 of the BMGR INRMP. Regarding the border itself, approximately 10 miles of the 31 miles of border fence on BMGR West are accessible to members of the public with a U.S. Marine Corps-issued permit. These 10 miles of border can be accessed through three roads or any number of foot trails. Only these three roads leading to the border through BMGR West are accessible to the public, and these roads require a U.S. Marine Corps-issued permit. There is no unfettered public access anywhere in BMGR West.
81. I am further informed that areas within BMGR West that are currently open to the public for recreation through a U.S. Marine Corps-issued permit will remain open to the public for such purposes, subject to occasional temporary closures to support military activities that present safety hazards or have security requirements. Roads that are currently open to the public within BMGR West will remain open to the public, although accessibility to some roads may be limited while construction projects are underway. Additional details regarding public access to BMGR and recreation in BMGR are provided in Figures 2.8 and 7.1 and Sections 2.3.6 and 7.2 of the BMGR INRMP.

Yuma 2

*Sierra Club – Broyles Declaration*

82. Broyles claims that “my enjoyment of these areas also will also be damaged by the incessant lighting associated with the wall and its construction, and the widening of roads and attendant noise and dust associated with construction.” (§ 17) While Broyles does not specify exactly which areas are concerned, it appears that Broyles is referring to BMGR and Cabeza Prieta. (§ 18) Broyles also claims that barrier construction will “blight a landscape whose core attractions include unimpeded views across the border” (§ 18) and that that “the presence of a thirty-foot wall would reduce the size of the Refuge and Range available for enjoyable public use.” (§ 16). These claims are exaggerated because there is already a pedestrian barrier and patrol road in this area, the small corridor required for construction already functions like a law enforcement zone, and construction impacts will be temporary.

*Sierra Club – Hartman Declaration*

83. Hartman claims that “wall segments will fundamentally alter my experience of these lands [i.e., Yuma 2, 3, and 10/27], by intruding upon the natural beauty, and historical connectedness of people and species, that I visit these areas to experience. The roads and lighting will likewise diminish the features I hold dear.” (§ 15) These claims are conclusory

and exaggerated due to the existing infrastructure, narrow construction corridor, and given that the area already functions like a law enforcement zone.

*Sierra Club – Tuell Declaration*

84. Tuell expresses concern about the impact of construction on Organ Pipe Cactus National Monument and Quitobaquito Springs. (¶ 10) Neither this nor any other Section 2808 project is on or affects these two areas.

Yuma 10/27

*Sierra Club – Broyles Declaration*

85. See ¶ 82 of this declaration.

*Sierra Club – Hartman Declaration*

86. See ¶ 83 of this declaration.

Yuma 3

87. As discussed above, there is existing post and rail-style vehicle barrier within the Yuma 3 project area, which will be replaced with primary pedestrian barrier as a part of the Yuma 3 project. There is also an existing patrol road that is situated immediately north of the existing vehicle barrier in most of the project area.

a. *Sierra Club – Broyles Declaration*

- i. Broyles also claims that barrier construction will “blight a landscape whose core attractions include unimpeded views across the border.” (¶ 18) There is already existing vehicle barrier on this land, which is being replaced with pedestrian barrier.

b. *Sierra Club – Hartman Declaration*

- i. Hartman claims that “wall segments will fundamentally alter my experience of these lands (i.e., Yuma 2, 3, and 10/27), by intruding upon the natural beauty, and historical connectedness of people and species, that I visit these areas to experience. The roads and lighting will likewise diminish the features I hold dear.” (¶ 15). This claim is exaggerated due to the existing barrier infrastructure in the Yuma 3 project area, the narrow corridor required for construction, and the fact that this already functions as a law enforcement zone.

### El Paso 8

88. Within the El Paso 8 project area there is existing Normandy-style vehicle barrier, which will be replaced with primary pedestrian barrier as a part of the El Paso 8 project. In addition, there is an existing patrol road that is situated immediately north of the vehicle barrier. The new secondary barrier will be constructed immediately north of the new primary pedestrian barrier and the existing patrol road.

a. *Sierra Club – Ardovino and Bixby Declarations*

- i. Ardovino and Bixby both claim to recreate in these areas; however, there appears to be only private land surrounding this project area. In addition, there will be a small construction footprint relative to the size of the surrounding land.

b. *Sierra Club – Roemer Declaration*

- i. Roemer claims that pedestrian barrier will negatively impact views of the area. (¶ 15) This claim is exaggerated given the narrow construction corridor relative to the size of the surrounding land.

c. *Sierra Club – Walsh Declaration*

- i. Walsh claims that the project will affect her “interest in enjoying and recreating in the large geographic zone in the El Paso Sector.” (¶ 10) This claim is exaggerated because, as she notes herself, the area surrounding this project is vast and the construction corridor required for this project is relatively narrow.

### El Paso 2

89. As noted above, there is existing Normandy-style vehicle barrier within the El Paso 2 project area, which will be replaced with primary pedestrian barrier. There is also an existing patrol road that is situated immediately north of the existing pedestrian barrier.

- a. The facts related to El Paso 8 claims in the Ardovino, Bixby, Roemer, and Walsh Declarations apply equally to El Paso 2.

### Laredo 7

*Sierra Club – Miller Declaration*

90. Miller claims that the project will affect him “aesthetically” as he conducts research along the Rio Grande River. (¶ 10) As noted above, all land along this project is private land.

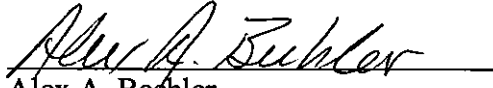
*Sierra Club – Thompson Declaration*

91. Thompson claims that the project will make it “impossible or extremely difficult” to view historic sections of the border in the future. (¶ 13) This claim is exaggerated since all land along this project is private land.

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I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my current knowledge.

Executed on: October 25, 2019

  
Alex A. Beehler

# **ATTACHMENT A**

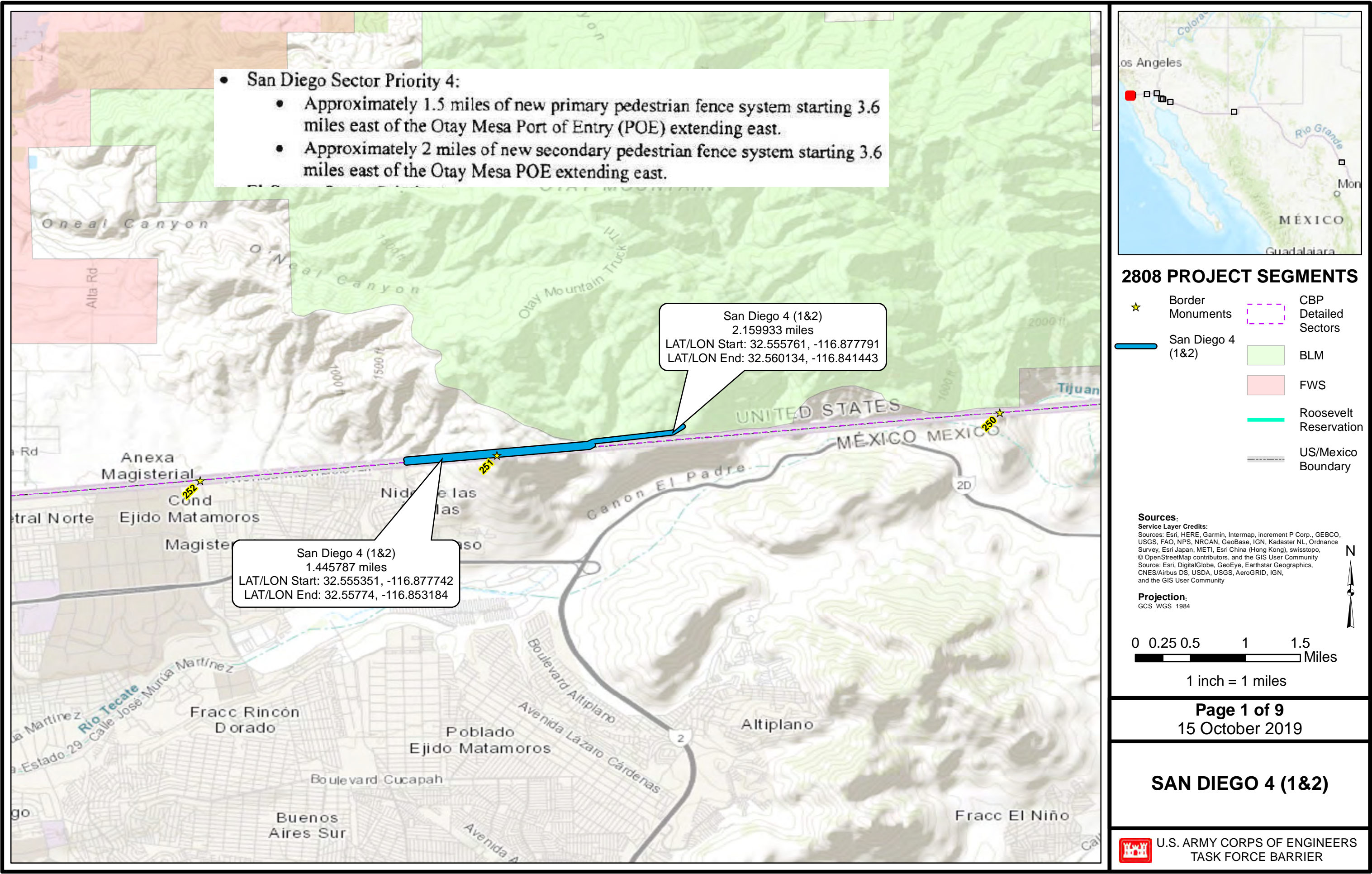
# TASK FORCE BARRIER 2808 PROJECT SEGMENTS

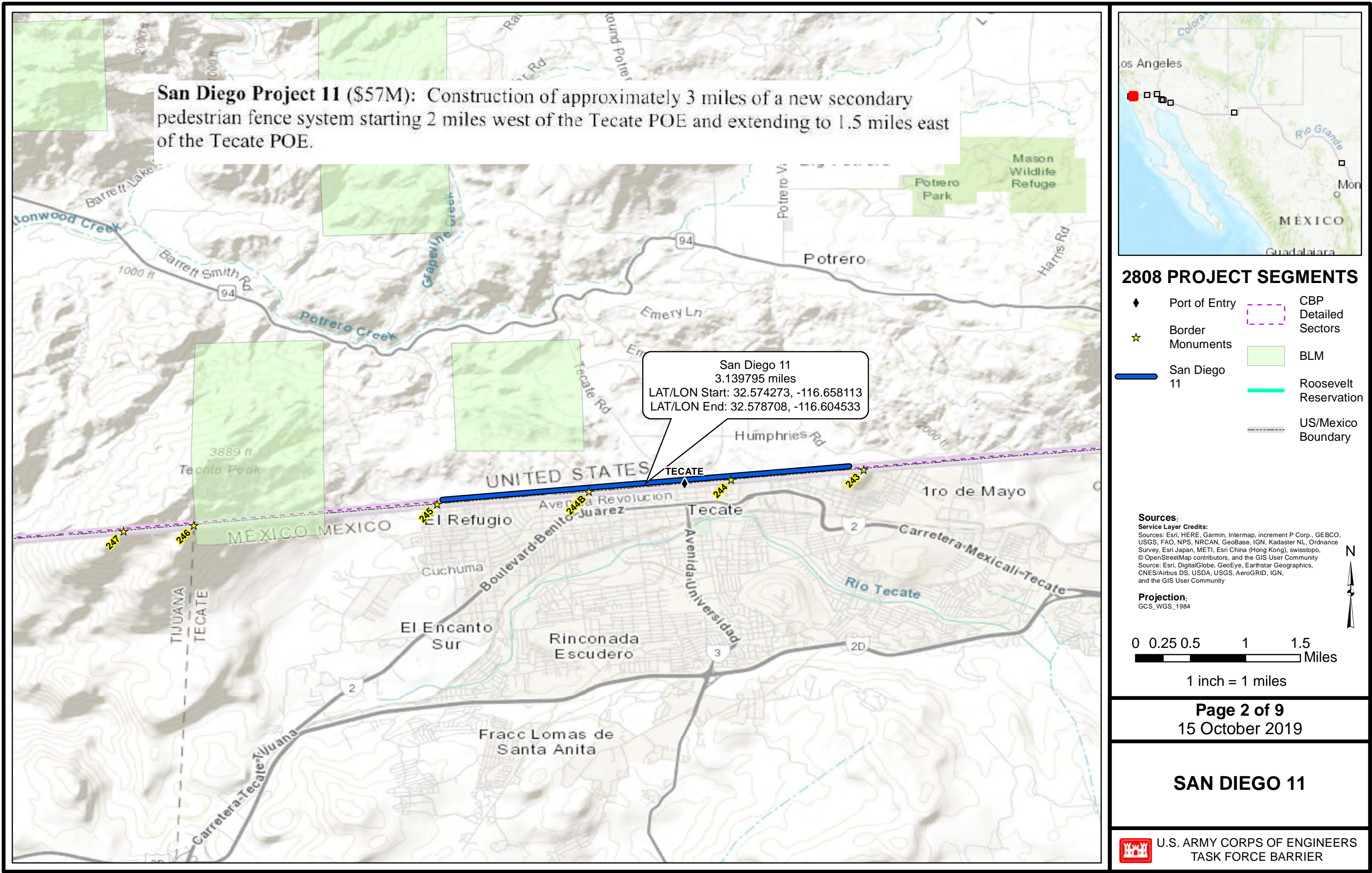


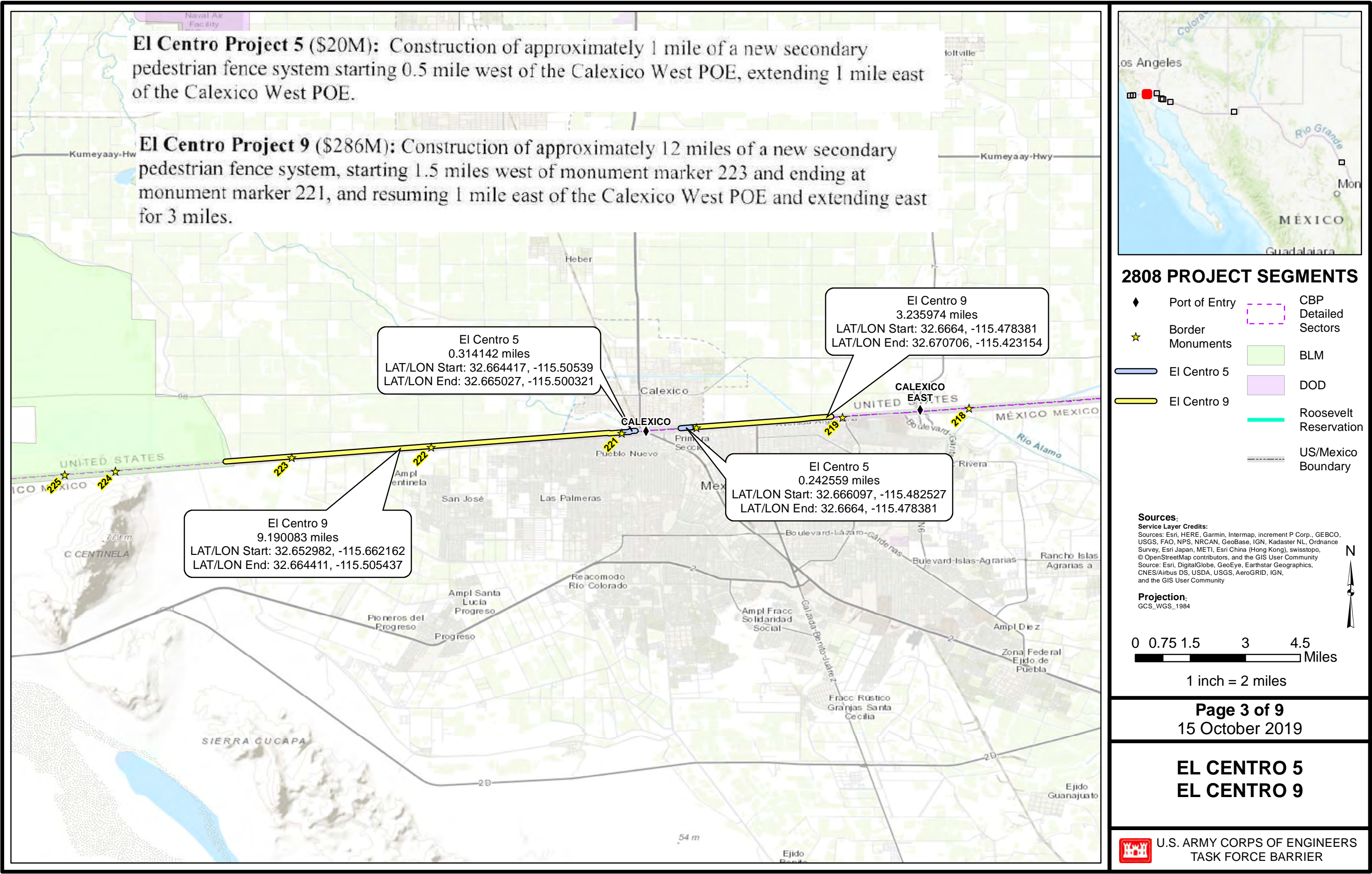
**DATE: 15 OCTOBER 2019**

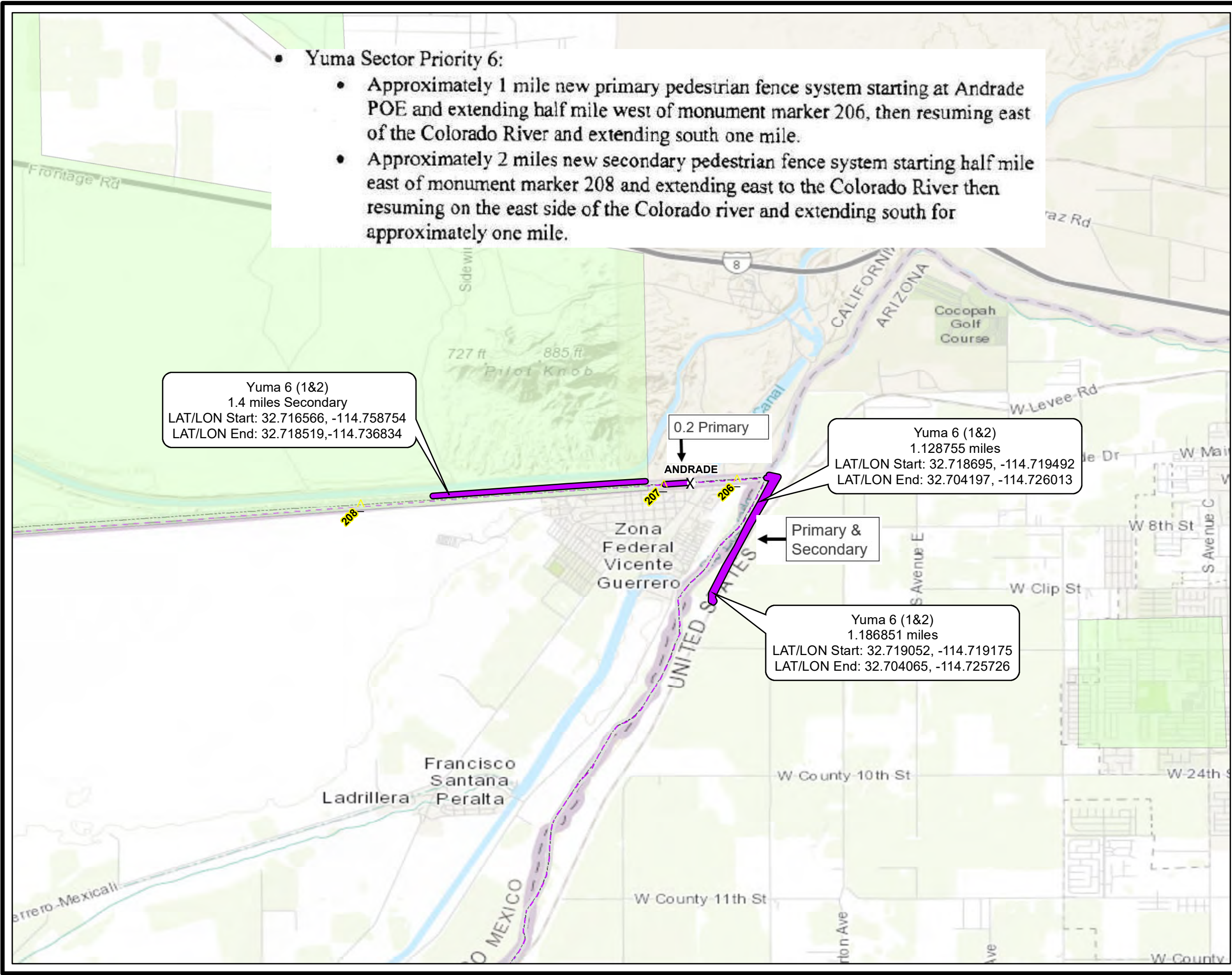


**U.S. ARMY CORPS OF ENGINEERS  
TASK FORCE BARRIER**

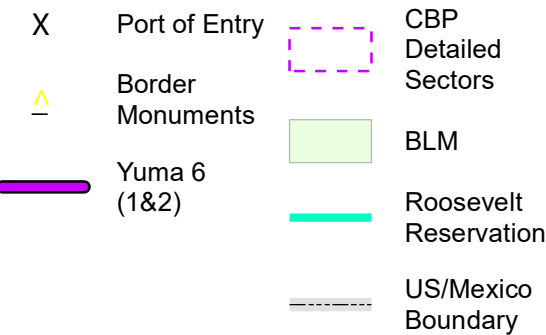






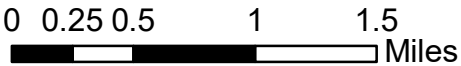


**2808 PROJECT SEGMENTS**



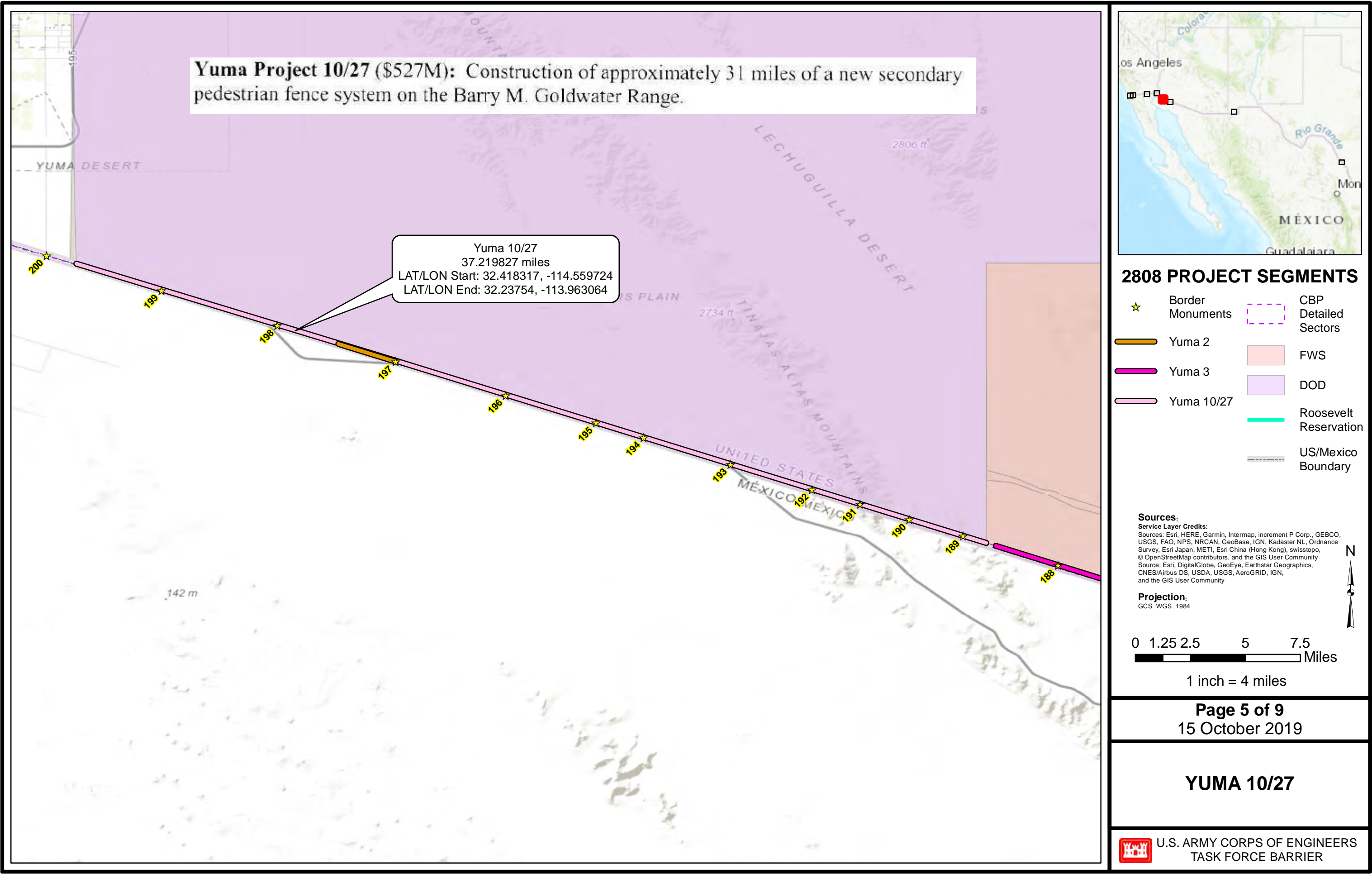
**Sources:**  
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Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community

**Projection:**  
GCS\_WGS\_1984



1 inch = 1 miles

**YUMA 6 (1&2)**



**Yuma Project 2 (\$40M):** Replacement of one segment of primary pedestrian fencing on the Barry M. Goldwater Range starting 2.5 miles east of Border Monument 198 and extending east to Border Monument 297, for a total of approximately 1.5-2 miles.

Yuma 2  
2.334848 miles  
LAT/LON Start: 32.365314, -114.386621  
LAT/LON End: 32.357924, -114.3624

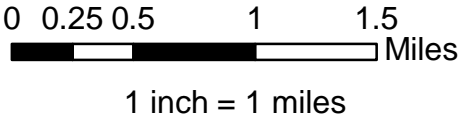


**2808 PROJECT SEGMENTS**

- ★ Border Monuments
- Yuma 2
- Yuma 10/27
- CBP Detailed Sectors
- DOD
- Roosevelt Reservation
- US/Mexico Boundary

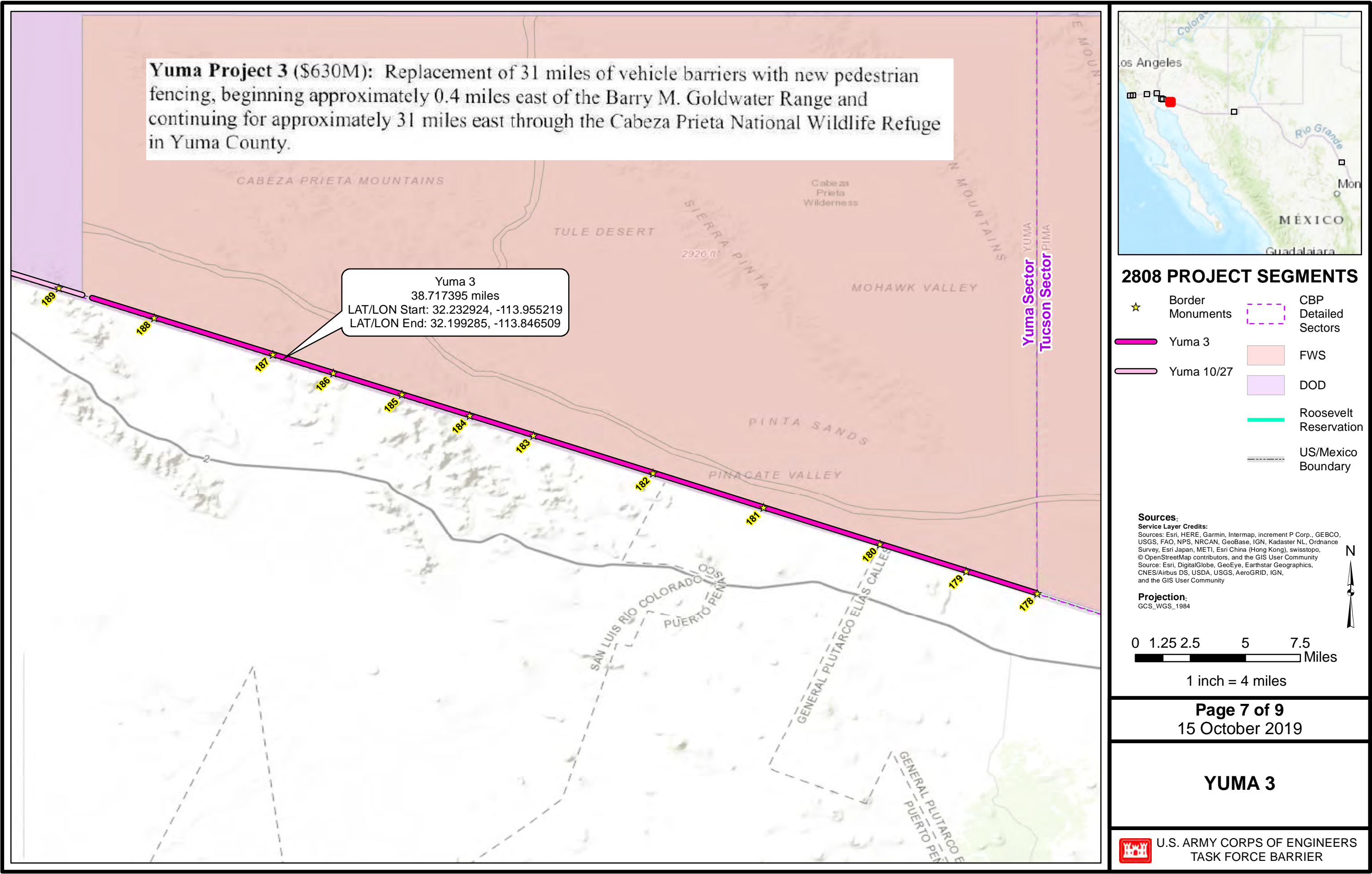
**Sources:**  
Service Layer Credits:  
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community  
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

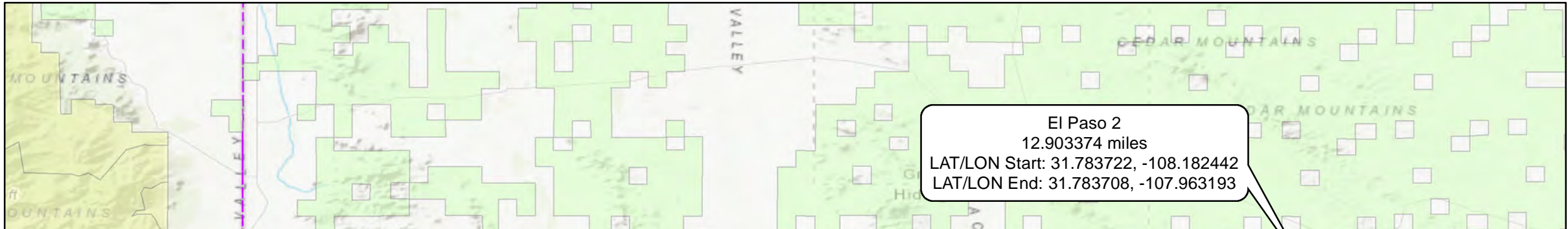
**Projection:**  
GCS\_WGS\_1984



**Page 6 of 9**  
15 October 2019

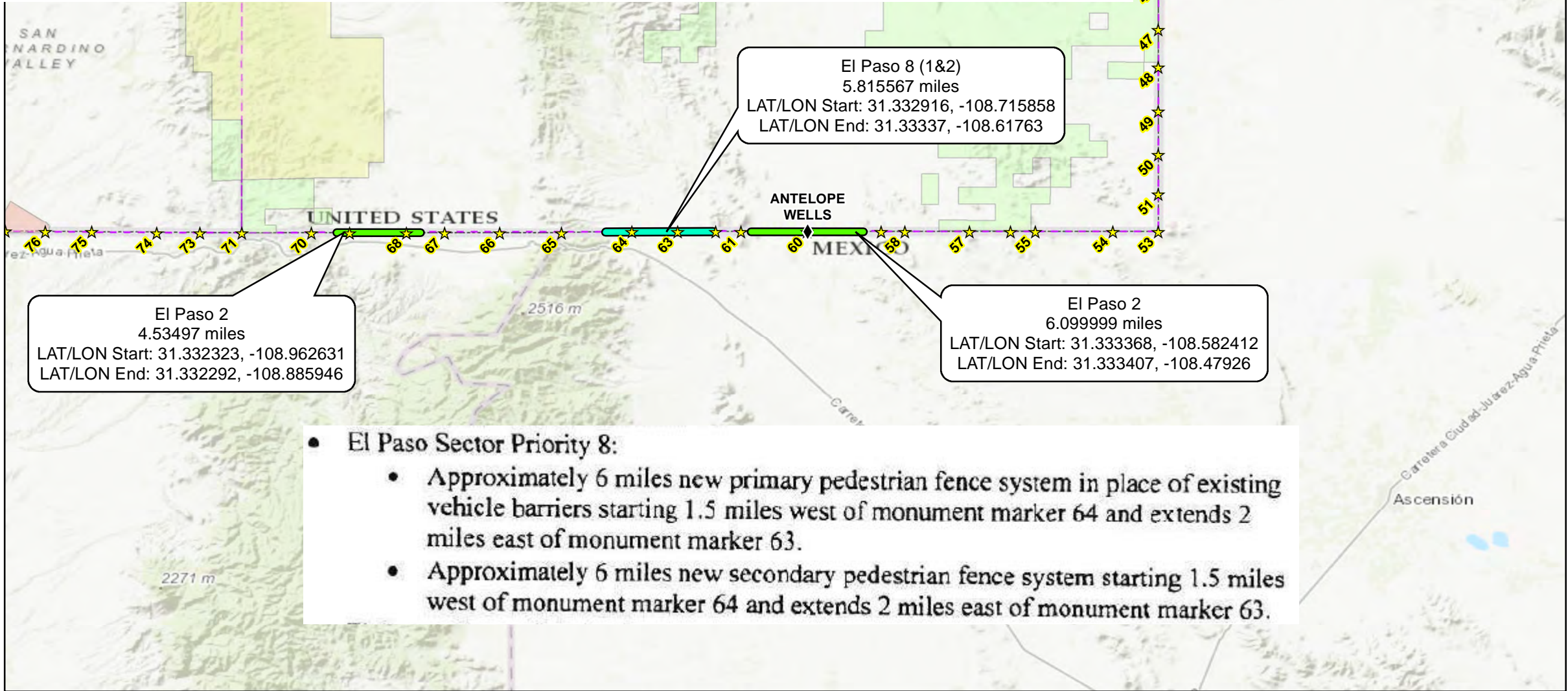
**YUMA 2**





**El Paso Project 2 (\$476M):** Replacement of 23.51 miles of vehicle barriers with new pedestrian fencing in noncontiguous segments within Hidalgo and Luna Counties, New Mexico.

- The first segment begins approximately 5.1 miles east of the New Mexico/Arizona Border, continuing east for 4.55 miles.
- The second segment begins approximately 3 miles west of the Antelope Wells POE to 3 miles east of the POE for 6.12 miles.
- The third segment begins approximately 20 miles west of the Columbus POE, extending west for 12.84 miles.

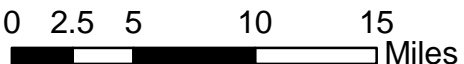


**2808 PROJECT SEGMENTS**

- ◆ Port of Entry
- ★ Border Monuments
- El Paso 2
- El Paso 8 (1&2)
- CBP Detailed Sectors
- BLM
- FS
- FWS
- Roosevelt Reservation
- US/Mexico Boundary

**Sources:**  
Service Layer Credits:  
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community  
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**Projection:**  
GCS\_WGS\_1984



1 inch = 8 miles

**Page 8 of 9**  
15 October 2019

**EL PASO 2**  
**EL PASO 8**

Del Rio Sector  
Laredo Sector

**Laredo Project 7 (\$1,268M):** Construction of approximately 52 miles of a new primary pedestrian fence system starting from the Laredo-Columbia Solidarity POE North West for approximately 52 miles along the Rio-Grande River.

Laredo 7  
52.45904 miles  
LAT/LON Start: 28.196854, -100.208841  
LAT/LON End: 28.121442, -100.070333



**2808 PROJECT SEGMENTS**

- ◆ Port of Entry
- Laredo 7
- ▭ CBP Detailed Sectors
- Roosevelt Reservation
- US/Mexico Boundary

**Sources:**  
Service Layer Credits:  
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community  
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**Projection:**  
GCS\_WGS\_1984

0 1.25 2.5 5 7.5  
Miles

1 inch = 4 miles

**Page 9 of 9**  
15 October 2019

**LAREDO 7**

# **ATTACHMENT B**

BURROWING OWL SURVEY PROTOCOL  
AND MITIGATION GUIDELINES

Prepared by:

The California Burrowing Owl Consortium

April 1993

## INTRODUCTION

The California Burrowing Owl Consortium developed the following Survey Protocol and Mitigation Guidelines to meet the need for uniform standards when surveying burrowing owl (*Speotyto cunicularia*) populations and evaluating impacts from development projects. The California Burrowing Owl Consortium is a group of biologists in the San Francisco Bay area who are interested in burrowing owl conservation. The following survey protocol and mitigation guidelines were prepared by the Consortium's Mitigation Committee. These procedures offer a decision-making process aimed at preserving burrowing owls in place with adequate habitat.

California's burrowing owl population is clearly in peril and if declines continue unchecked the species may qualify for listing. Because of the intense pressure for development of open, flat grasslands in California, resource managers frequently face conflicts between owls and development projects. Owls can be affected by disturbance and habitat loss, even though there may be no direct impacts to the birds themselves or their burrows. There is often inadequate information about the presence of owls on a project site until ground disturbance is imminent. When this occurs there is usually insufficient time to evaluate impacts to owls and their habitat. The absence of standardized field survey methods impairs adequate and consistent impact assessment during regulatory review processes, which in turn reduces the possibility of effective mitigation.

These guidelines are intended to provide a decision-making process that should be implemented wherever there is potential for an action or project to adversely affect burrowing owls or the resources that support them. The process begins with a four-step survey protocol to document the presence of burrowing owl habitat, and evaluate burrowing owl use of the project site and a surrounding buffer zone. When surveys confirm occupied habitat, the mitigation measures are followed to minimize impacts to burrowing owls, their burrows and foraging habitat on the site. These guidelines emphasize maintaining burrowing owls and their resources in place rather than minimizing impacts through displacement of owls to an alternate site.

Each project and situation is different and these procedures may not be applicable in some circumstances. Finally, these are not strict rules or requirements that must be applied in all situations. They are guidelines to consider when evaluating burrowing owls and their habitat, and they suggest options for burrowing owl conservation when land use decisions are made.

Section 1 describes the four phase Burrowing Owl Survey Protocol. Section 2 contains the Mitigation Guidelines. Section 3 contains a discussion of various laws and regulations that protect burrowing owls and a list of references cited in the text.

We have submitted these documents to the California Department of Fish and Game (CDFG) for review and comment. These are untested procedures and we ask for your comments on improving their usefulness.

## **SECTION 1 BURROWING OWL SURVEY PROTOCOL**

### **PHASE I: HABITAT ASSESSMENT**

The first step in the survey process is to assess the presence of burrowing owl habitat on the project site including a 150-meter (approx. 500 ft.) buffer zone around the project boundary (Thomsen 1971, Martin 1973).

#### **Burrowing Owl Habitat Description**

Burrowing owl habitat can be found in annual and perennial grasslands, deserts, and scrublands characterized by low-growing vegetation (Zarn 1974). Suitable owl habitat may also include trees and shrubs if the canopy covers less than 30 percent of the ground surface. Burrows are the essential component of burrowing owl habitat: both natural and artificial burrows provide protection, shelter, and nests for burrowing owls (Henny and Blus 1981). Burrowing owls typically use burrows made by fossorial mammals, such as ground squirrels or badgers, but also may use man-made structures, such as cement culverts; cement, asphalt, or wood debris piles; or openings beneath cement or asphalt pavement.

#### **Occupied Burrowing Owl Habitat**

Burrowing owls may use a site for breeding, wintering, foraging, and/or migration stopovers. Occupancy of suitable burrowing owl habitat can be verified at a site by an observation of at least one burrowing owl, or, alternatively, its molted feathers, cast pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance. Burrowing owls exhibit high site fidelity, reusing burrows year after year (Rich 1984, Feeney 1992). A site should be assumed occupied if at least one burrowing owl has been observed occupying a burrow there within the last three years (Rich 1984).

The Phase II burrow survey is required if burrowing owl habitat occurs on the site. If burrowing owl habitat is not present on the project site and buffer zone, the Phase II burrow survey is not necessary. A written report of the habitat assessment should be prepared (Phase IV), stating the reason(s) why the area is not burrowing owl habitat.

### **PHASE II: BURROW SURVEY**

1. A survey for-burrows and owls should be conducted by walking through suitable habitat over the entire project site and in areas within 150 meters (approx 500 ft.) of the project impact zone. This 150-meter buffer zone is included to account for adjacent burrows and foraging habitat outside the project area and impacts from factors such as noise and vibration due to heavy equipment which could impact resources outside the project area.

2. Pedestrian survey transects should be spaced to allow 100 percent visual coverage of the ground surface. The distance between transect center lines should be no more than 30 meters (approx. 100 ft.), and should be reduced to account for differences in terrain, vegetation density, and ground surface visibility. To efficiently survey projects larger than 100 acres, it is recommended that two or more surveyors conduct concurrent surveys. Surveyors should maintain a minimum distance of 50 meters (approx. 160 ft.) from any owls or occupied burrows. It is important to minimize disturbance near occupied burrows during all seasons.
3. If burrows or burrowing owls are recorded on the site, a map should be prepared of the burrow concentration areas. A breeding season survey and census (Phase III) of burrowing owls is the next step required.
4. Prepare a report (Phase IV) of the burrow survey stating whether or not burrows are present.
5. A preconstruction survey may be required by project-specific mitigations no more than 30 days prior to ground disturbing activity.

### **PHASE III: BURROWING OWL SURVEYS, CENSUS AND MAPPING**

If the project site contains burrows that could be used by burrowing owls, then survey efforts should be directed towards determining owl presence on the site. Surveys in the breeding season are required to describe if, when, and how the site is used by burrowing owls. If no owls are observed using the site during the breeding season, a winter survey is required.

#### **Survey Methodology**

A complete burrowing owl survey consists of four site visits. During the initial site visit examine burrows for owl sign and map the locations of occupied burrows. Subsequent observations should be conducted from as many fixed points as necessary to provide visual coverage of the site using spotting scopes or binoculars. It is important to minimize disturbance near occupied burrows during all seasons. Site visits must be repeated on four separate days. Conduct these visits from two hours before sunset to one hour after or from one hour before to two hours after sunrise. Surveys should be conducted during weather that is conducive to observing owls outside their burrows. Avoid surveys during heavy rain, high winds (> 20 mph), or dense fog.

**Nesting Season Survey.** The burrowing owl nesting season begins as early as February 1 and continues through August 31 (Thomsen 1971, Zam 1974). The timing of nesting activities may vary with latitude and climatic conditions. If possible, the nesting season survey should be conducted during the peak of the breeding season, between April 15 and July 15. Count and map all burrowing owl sightings, occupied burrows, and burrows with owl sign. Record numbers of pairs and juveniles, and behavior such as courtship and copulation. Map the approximate territory boundaries and foraging areas if known.

**Survey for Winter Residents (non-breeding owls).** Winter surveys should be conducted between December 1 and January 31, during the period when wintering owls are most likely to be present. Count and map all owl sightings, occupied burrows, and burrows with owl sign.

Surveys Outside the Winter and Nesting Seasons. Positive results, (i.e., owl sightings)- outside of the above survey periods would be adequate to determine presence of owls on site. However, results of these surveys may be inadequate for mitigation planning because the numbers of owls and their pattern of distribution may change during winter and nesting seasons. Negative results during surveys outside the above periods are not conclusive proof that owls do not use the site.

**Preconstruction Survey.** A preconstruction survey may be required by project-specific mitigations and should be conducted no more than 30 days prior to ground disturbing activity.

## **PHASE IV: RESOURCE SUMMARY, WRITTEN REPORT**

A report should be prepared for CDFG that gives the results of each Phase of the survey protocol, as outlined below.

### **Phase I: Habitat Assessment**

1. Date and time of visit(s) including weather and visibility conditions; methods of survey.
2. Site description including the following information: location, size, topography, vegetation communities, and animals observed during visit(s).
3. An assessment of habitat suitability for burrowing owls and explanation.
4. A map of the site.

### **Phase II: Burrow Survey**

1. Date and time of visits including weather and visibility conditions; survey methods including transect spacing.
2. A more detailed site description should be made during this phase of the survey protocol including a partial plant list of primary vegetation, location of nearest freshwater (on or within one mile of site), animals observed during transects.
3. Results of survey transects including a map showing the location of concentrations of burrow(s) (natural or artificial) and owl(s), if present.

### **Phase III: Burrowing Owl Surveys, Census and Mapping**

1. Date and time of visits including weather and visibility conditions; survey methods including transect spacing.
2. Report and map the location of all burrowing owls and owl sign. Burrows occupied by owl(s) should be mapped indicating the number of owls at each burrow. Tracks, feathers, pellets, or other items (prey remains, animal scat) at burrows should also be reported.
3. Behavior of owls during the surveys should be carefully recorded (from a distance) and reported. Describe and map areas used by owls during the surveys. Although not required, all behavior is valuable to document including feeding, resting, courtship, alarm, territorial, parental, or juvenile behavior.
4. Both winter and nesting season surveys should be summarized. If possible include information regarding productivity of pairs, seasonal pattern of use, and include a map of the colony showing territorial boundaries and home ranges.
5. The historical presence of burrowing owls on site should be documented, as well as the source of such information (local bird club, Audubon society, other biologists, etc.).

# Burrowing: Owl Survey Protocol

April 1993

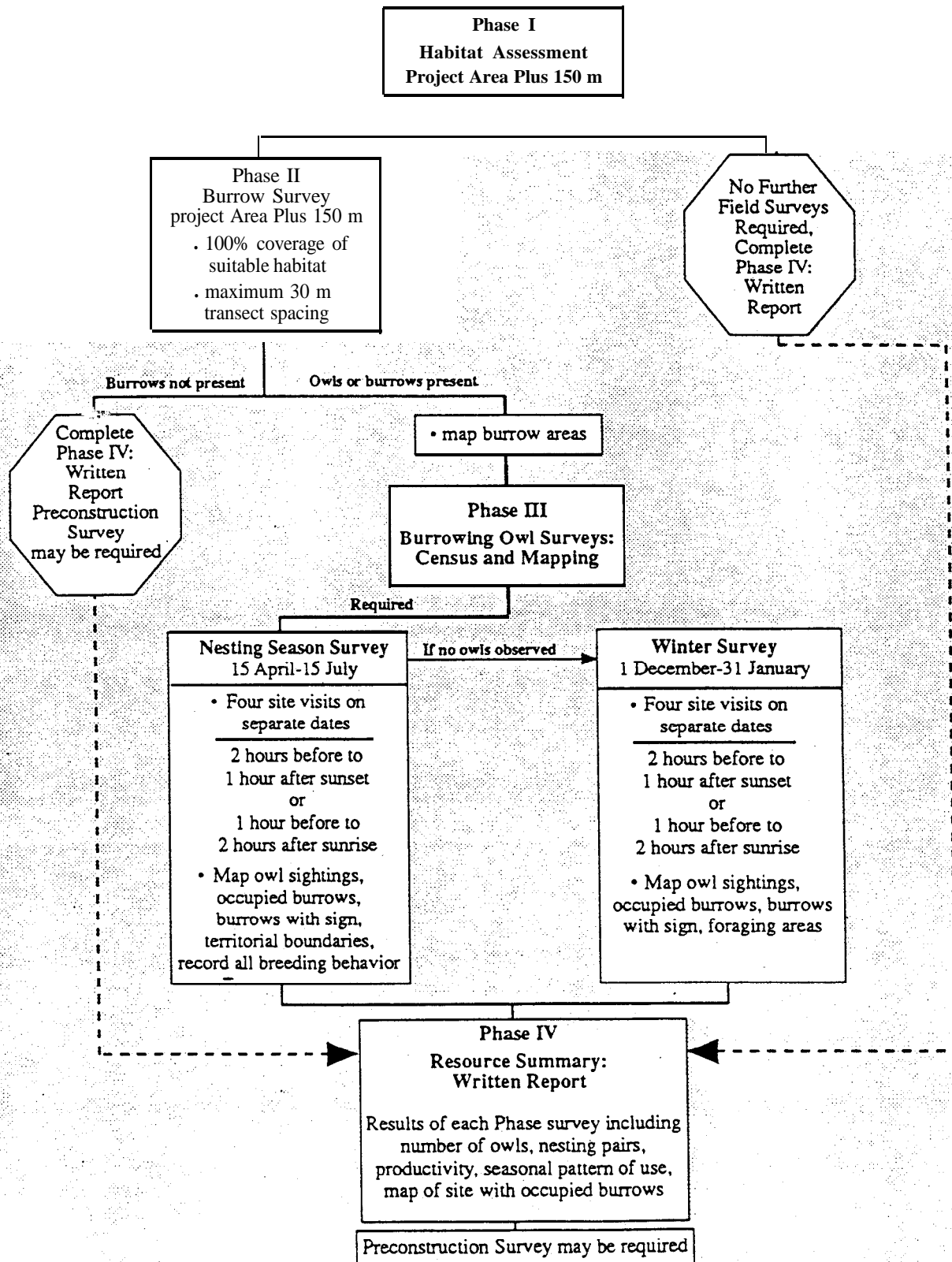


Figure 1.

## SECTION 2 BURROWING OWL MITIGATION GUIDELINES

The objective of these mitigation guidelines is to minimize impacts to burrowing owls and the resources that support viable owl populations. These guidelines are intended to provide a decision-making process that should be implemented wherever there is potential for an action or project to adversely affect burrowing owls or their resources. The process begins with a four-step survey protocol (see *Burrowing Owl Survey Protocol*) to document the presence of burrowing owl habitat, and evaluate burrowing owl use of the project site and a surrounding buffer zone. When surveys confirm occupied habitat, the mitigation measures described below are followed to minimize impacts to burrowing owls, their burrows and foraging habitat on the site. These guidelines emphasize maintaining burrowing owls and their resources in place rather than minimizing impacts through displacement of owls to an alternate site.

Mitigation actions should be carried out prior to the burrowing owl breeding season, generally from February 1 through August 31 (Thomsen 1971, Zarn 1974). The timing of nesting activity may vary with latitude and climatic conditions. Project sites and buffer zones with suitable habitat should be resurveyed to ensure no burrowing owls have occupied them in the interim period between the initial surveys and ground disturbing activity. Repeat surveys should be conducted not more than 30 days prior to initial ground disturbing activity.

### DEFINITION OF IMPACTS

1. Disturbance or harassment within 50 meters (approx. 160 ft.) of occupied burrows.
2. Destruction of burrows and burrow entrances. Burrows include structures such as culverts, concrete slabs and debris piles that provide shelter to burrowing owls.
3. Degradation of foraging habitat adjacent to occupied burrows.

### GENERAL CONSIDERATIONS

1. Occupied burrows should not be disturbed during the nesting season, from February 1 through August 31, unless the Department of Fish and Game verifies that the birds have not begun egg-laying and incubation or that the juveniles from those burrows are foraging independently and capable of independent survival at an earlier date.
2. A minimum of 6.5 acres of foraging habitat, calculated on a 100-m (approx. 300 ft.) foraging radius around the natal burrow, should be maintained per pair (or unpaired resident single bird) contiguous with burrows occupied within the last three years (Rich 1984, Feeney 1992). Ideally, foraging habitat should be retained in a long-term conservation easement.

3. When destruction of occupied burrows is unavoidable, burrows should be enhanced (enlarged or cleared of debris) or created (by installing artificial burrows) in a ratio of 1:1 in adjacent suitable habitat that is contiguous with the foraging habitat of the affected owls.
4. If owls must be moved away from the disturbance area, passive relocation (see below) is preferable to trapping. A time period of at least one week is recommended to allow the owls to move and acclimate to alternate burrows.
5. The mitigation committee recommends monitoring the success of mitigation programs as required in Assembly Bill 3180. A monitoring plan should include mitigation success criteria and an annual report should be submitted to the California Department of Fish and Game.

## **AVOIDANCE**

### **Avoid Occupied Burrows**

No disturbance should occur within 50 m (approx. 160 ft.) of occupied burrows during the non-breeding Season of September 1 through January 31 or within 75 m (approx. 250 ft.) during the breeding Season of February 1 through August 31. Avoidance also requires that a minimum of 6.5 acres of foraging habitat be preserved contiguous with occupied burrow sites for each pair of breeding burrowing owls (with or without dependent young) or single unpaired resident bird (Figure 2).

## **MITIGATION FOR UNAVOIDABLE IMPACTS**

### **On-site Mitigation**

On-site passive relocation should be implemented if the above avoidance requirements cannot be met. Passive relocation is defined as encouraging owls to move from occupied burrows to alternate natural or artificial burrows that are beyond 50 m from the impact zone and that are within or contiguous to a minimum of 6.5 acres of foraging habitat for each pair of relocated owls (Figure 3). Relocation of owls should only be implemented during the non-breeding season. On-site habitat should be preserved in a conservation easement and managed to promote burrowing owl use of the site.

Owls should be excluded from burrows in the immediate impact zone and within a 50 m (approx. 160 ft.) buffer zone by installing one-way doors in burrow entrances: One-way doors should be left in place 48 hours to insure owls have left the burrow before excavation. One alternate natural or artificial burrow should be provided for each burrow that will be excavated in the project impact zone. The project area should be monitored daily for one week to confirm owl use of alternate burrows before excavating burrows in the immediate impact zone. Whenever possible, burrows should be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible plastic pipe or burlap bags should be inserted into the tunnels

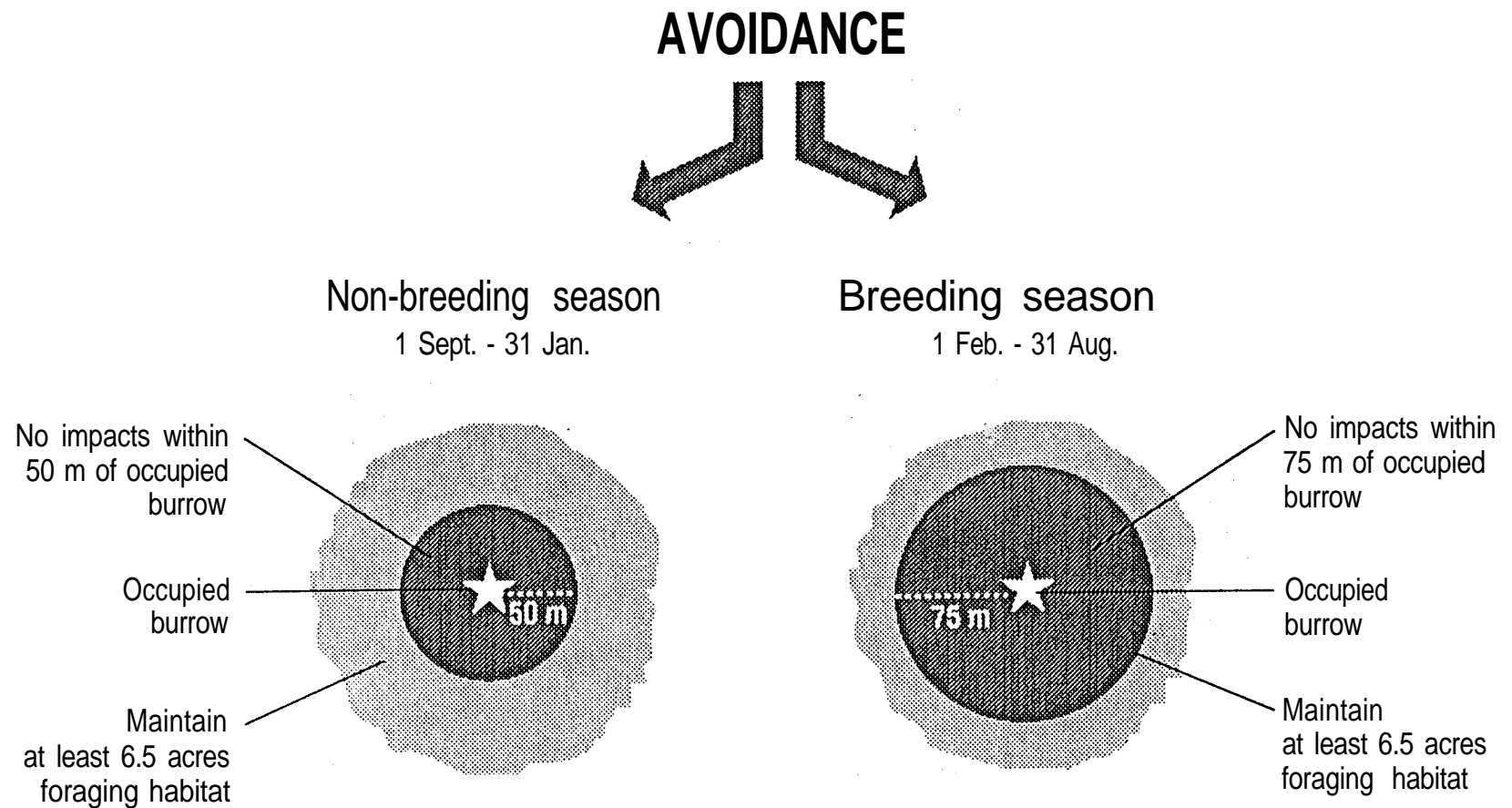


Figure 2. Burrowing owl mitigation guidelines.

## ON-SITE MITIGATION IF AVOIDANCE NOT MET

(More than 6.5 acres suitable habitat available)

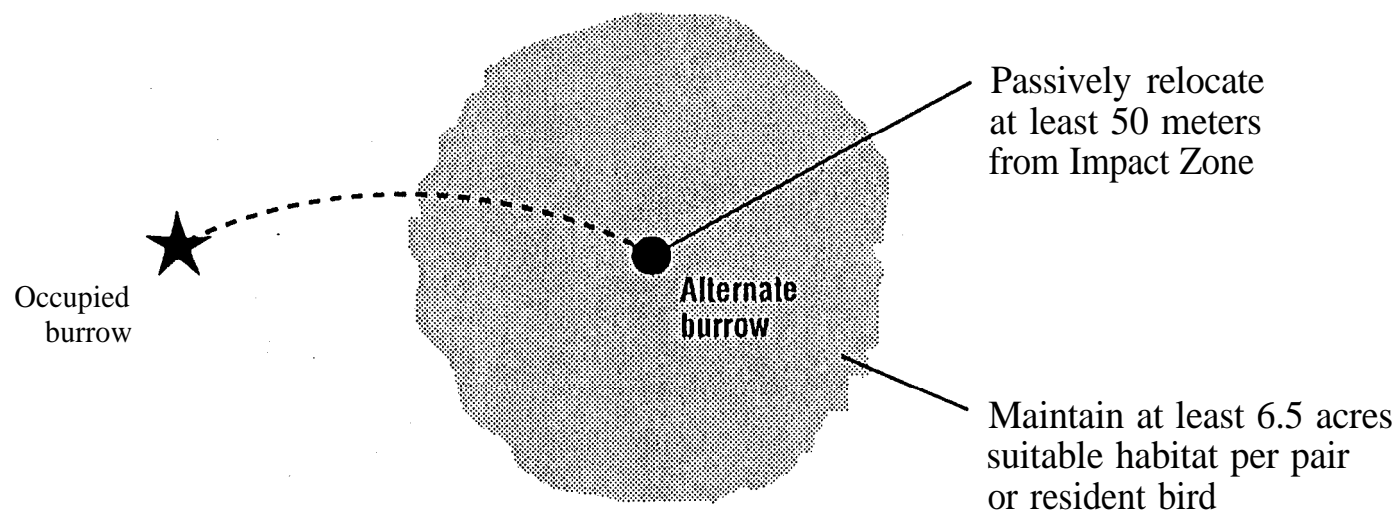


Figure 3. Burrowing owl mitigation guidelines.

during excavation to maintain an escape route for any animals inside the burrow.

### **Off-site Mitigation**

If the project will reduce suitable habitat on-site below the threshold level of 6.5 acres per relocated pair or single bird, the habitat should be replaced off-site. Off-site habitat must be suitable burrowing owl habitat, as defined in the *Burrowing Owl Survey Protocol*, and the site approved by CDFG. Land should be purchased and/or placed in a conservation easement in perpetuity and managed to maintain suitable habitat. Off-site mitigation should use one of the following ratios:

1. Replacement of occupied habitat with occupied habitat: 1.5 times 6.5 (9.75) acres per pair or single bird.
2. Replacement of occupied habitat with habitat contiguous to currently occupied habitat: 2 times 6.5 (13.0) acres per pair or single bird.
3. Replacement of occupied habitat with suitable unoccupied habitat: 3 times 6.5 (19.5) acres per pair or single bird.

### SECTION 3 LEGAL STATUS

The burrowing owl is a migratory bird species protected by international treaty under the Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703-711). The MBTA makes it unlawful to take, possess, buy, sell, purchase, or barter, any migratory bird listed in 50 C.F.R. Part 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 C.F.R. 21). Sections 3503, 3503.5, and 3800 of the California Department of Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs. Implementation of the take provisions requires that project-related disturbance at active nesting territories be reduced or eliminated during critical phases of the nesting cycle (March 1 - August 15, annually). Disturbance that causes nest abandonment and/or loss of reproductive effort (e.g., killing or abandonment of eggs or young) or the loss of habitat upon which the birds depend is considered “taking” and is potentially punishable by fines and/or imprisonment. Such taking would also violate federal law protecting migratory birds (e.g., MBTA).

The burrowing owl is a Species of Special Concern to California because of declines of suitable habitat and both localized and statewide population declines. Guidelines for the Implementation of the California Environmental Quality Act (CEQA) provide that a species be considered as endangered or “rare” regardless of appearance on a formal list for the purposes of the CEQA (Guidelines, Section 15380, subsections b and d). The CEQA requires a mandatory findings of significance if impacts to threatened or endangered species are likely to occur (Sections 21001(c), 21083. Guidelines 15380, 15064, 15065). Avoidance or mitigation must be presented to reduce impacts to less than significant levels.

### CEQA AND SUBDIVISION MAP ACT

CEQA Guidelines Section 15065 directs that a mandatory finding of significance is required for projects that have the potential to substantially degrade or reduce the habitat of, or restrict the range of a threatened or endangered species. CEQA requires agencies to implement feasible mitigation measures or feasible alternatives identified in EIR’s for projects which will otherwise cause significant adverse impacts (Sections 21002, 21081, 21083; Guidelines, sections 15002, subd. (a)(3), 15021, subd. (a)(2), 15091, subd. (a)).

To be legally adequate, mitigation measures must be capable of “avoiding the impact altogether by not taking a certain action or parts of an action”; “minimizing impacts by limiting the degree or magnitude of the action and its implementation”; “rectifying the impact by repairing, rehabilitating or restoring the impacted environment”; “or reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.” (Guidelines, Section 15.370).

Section 66474 (e) of the Subdivision Map Act states “a legislative body of a city or county shall deny approval of a tentative map or parcel map for which a tentative map was not required, if

it makes any of the following findings:... (e) that the design of the subdivision or the proposed improvements are likely to cause substantial environmental damage or substantially and avoidably injure fish and wildlife or their habitat". In recent court cases, the court upheld that Section 66474(e) provides for environmental impact review separate from and independent of the requirements of CEQA (Topanga Assn. for a Scenic Community v. County of Los Angeles, 263 Cal. Rptr. 214 (1989).). The finding in Section 66174 is in addition to the requirements for the preparation of an EIR or Negative Declaration.

## LITERATURE CITED

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- Rich, T. 1984. Monitoring burrowing owl populations: Implications of burrow re-use. Wildlife Society Bulletin 12: 178- 180.
- Thomsen, L. 1971. Behavior and ecology of burrowing owls on the Oakland Municipal Airport. Condor 73: 177-192.
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# **ATTACHMENT C**

# BARRY M. GOLDWATER RANGE

## INTEGRATED NATURAL RESOURCES MANAGEMENT PLAN

### INRMP UPDATE

August 2018



Prepared for:

U.S. Department of the Air Force, Luke Air Force Base

U.S. Department of the Navy, U.S. Marine Corps, Marine Corps Air Station Yuma

In cooperation with:

U.S. Department of the Interior, Fish and Wildlife Service,

Cabeza Prieta National Wildlife Refuge

and

Arizona Game and Fish Department



Prepared by:

Colorado State University

Center for Environmental Management of Military Lands

**U. S. Air Force**  
**Integrated Natural Resource Management Plan 2018 Update**  
**Barry M. Goldwater Range (BMGR)**  
**Arizona**



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***About This Plan***

This installation-specific environmental management plan is based on the U.S. Air Force's (USAF) standardized Integrated Natural Resources Management Plan (INRMP) template. This INRMP has been developed according to the Sikes Act Improvement Act (16 U.S. Code § 670 et seq., as amended through 2014) in cooperation with applicable stakeholders, which may include cooperating agencies and/or local equivalents, to document how natural resources will be managed. Non-U.S. territories will comply with applicable Final Governing Standards. Where applicable, external resources, including Air Force Instructions; Marine Corps Orders; USAF Playbooks; United States Marine Corps (USMC) Handbooks; and federal, state, local, Final Governing Standards, biological opinions, and permit requirements, are referenced herein.

The Barry M. Goldwater Range (BMGR) is unique in that management of the range is shared between the USAF and USMC. Whereas this 2018 INRMP follows the USAF standardized template, USMC-specific policies have been incorporated and the plan adheres to Marine Corps Order (MCO) 5090.2A with changes 1–3 of the *Environmental Compliance and Protection Manual* (USMC 2013).

Certain sections of the USAF INRMP template begin with standardized, USAF-wide “common text” language that addresses USAF and Department of Defense policies and federal requirements. For USAF INRMPs this common text language is restricted from editing to ensure that it remains standard throughout all plans. Due to the joint management of the BMGR this text has been edited to include USMC language as appropriate.

*NOTE: The terms ‘Natural Resources Manager’ (NRM) and Point of Contact (POC) are used throughout this document to refer to the installation person responsible for the natural resources program, regardless of whether this person meets the qualifications within the definition of a natural resources management professional in U.S. Department of Defense (DoD) Instruction 4715.03, with change 1 (DoD Instruction 2017a).*

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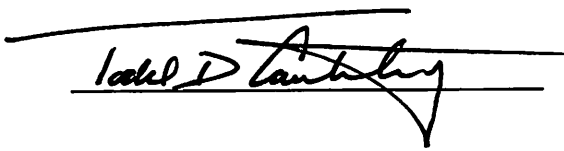
**FIVE YEAR REVIEW AND UPDATE OF THE  
INTEGRATED NATURAL RESOURCES MANAGEMENT PLAN  
2018-2023**

**Barry M. Goldwater Range  
Maricopa, Pima, and Yuma Counties, Arizona**

**APPROVAL**

This five-year review and update of the Integrated Natural Resources Management Plan was prepared by the United States Air Force and the United States Marine Corps – Barry M. Goldwater Range in cooperation with the United States Department of Interior, Fish and Wildlife Service and the Arizona Game and Fish Department. The signature below indicates concurrence with and acceptance of the following document. This plan has been prepared pursuant to the Sikes Act Improvement Act of 1998 (U.S. Code § 670a et seq., as amended through 2014).

Todd D. Canterbury  
Brigadier General, USAF  
Commander, 56th Fighter Wing  
Barry M. Goldwater Range, Arizona  
Luke Air Force Base, AZ

  
Date: 24 Oct 18

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David A. Suggs  
Colonel, USMC  
Commanding Officer  
Barry M. Goldwater Range, Arizona  
Marine Corps Air Station Yuma, AZ



Date: 20181022

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Amy Lueders  
Director, Southwest Region  
U.S. Fish and Wildlife Service



Date: Oct 8, 2018

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Ty E. Gray  
Director  
Arizona Game and Fish Department

  
Date: 8-23-18

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## ACRONYMS

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<b>ADC</b>	Air Defense Command
<b>ADOT</b>	Arizona Department of Transportation
<b>AFAF</b>	Air Force Auxiliary Field
<b>AFB</b>	Air Force Base
<b>AFI</b>	Air Force Instruction
<b>AGFD</b>	Arizona Game and Fish Department
<b>AGL</b>	Above Ground Level
<b>AHAS</b>	Avian Hazard Advisory System
<b>ALF</b>	Auxiliary Landing Field
<b>AML</b>	Appropriate Management Level
<b>AMSL</b>	Above Mean Sea Level
<b>ANG</b>	Air National Guard
<b>ARNG</b>	Army National Guard
<b>ARS</b>	Arizona Revised Statutes
<b>ASSP</b>	Arizona Site Stewards Program
<b>AUX</b>	Auxiliary Field
<b>AZ</b>	Arizona
<b>AZDA</b>	Arizona Department of Agriculture
<b>BASH</b>	Bird/Wildlife Aircraft Strike Hazard
<b>BEC</b>	Barry M. Goldwater Range Executive Council
<b>BGEPA</b>	Bald and Golden Eagle Protection Act
<b>BLM</b>	Bureau of Land Management
<b>BMGR</b>	Barry M. Goldwater Range
<b>BP</b>	U.S. Border Patrol
<b>CBP</b>	U.S. Customs & Border Protection
<b>CLEO</b>	Conservation Law Enforcement Officer
<b>CRP</b>	Comprehensive Range Plan
<b>DoD</b>	(U.S.) Department of Defense
<b>DOI</b>	Department of the Interior
<b>DZ</b>	Drop Zone
<b>EIS</b>	Environmental Impact Statement
<b>EMS</b>	Environmental Management System
<b>EO</b>	Executive Order
<b>EOD</b>	Explosive Ordnance Disposal
<b>ESA</b>	Endangered Species Act of 1973
<b>ESM</b>	Environmental Sciences Management
<b>ETAC</b>	East Tactical Range
<b>FIFRA</b>	Federal Insecticide, Fungicide, and Rodenticide Act of 1996
<b>FLPMA</b>	Federal Land Policy and Management Act of 1976
<b>FONSI</b>	Finding of No Significant Impact
<b>FTHL</b>	Flat-Tailed Horned Lizard
<b>FW</b>	Fighter Wing
<b>FY</b>	Fiscal Year
<b>GEOFidelis</b>	Marine Corps Installation Geospatial Information and Services
<b>GIS</b>	Geographic Information System
<b>GPS</b>	Global Positioning System
<b>HMA</b>	Herd Management Area

<b>ICRMP</b>	Integrated Cultural Resources Management Plan
<b>IEC</b>	Intergovernmental Executive Committee
<b>INRMP</b>	Integrated Natural Resources Management Plan
<b>IPMP</b>	Integrated Pest Management Plan
<b>KNOZ</b>	The new F-35 Auxiliary Landing Zone is known as KNOZ
<b>MBTA</b>	Migratory Bird Treaty Act of 1918
<b>MCAS</b>	Marine Corps Air Station
<b>MCO</b>	Marine Corps Order
<b>MLWA</b>	Military Lands Withdrawal Act of 1999
<b>MOU</b>	Memorandum of Understanding
<b>MP</b>	Management Policy
<b>NEPA</b>	National Environmental Policy Act of 1969
<b>NIPRNet</b>	Non-classified Internet Protocol Router Network
<b>NM</b>	National Monument
<b>NPS</b>	National Park Service
<b>NRCS</b>	Natural Resource Conservation Service
<b>NRM</b>	Natural Resource Manager
<b>NTAC</b>	North Tactical Range
<b>NWR</b>	National Wildlife Refuge
<b>OHV</b>	Off-Highway Vehicle
<b>P.L.</b>	Public Law
<b>PRIA</b>	Public Rangeland Improvement Act of 1978
<b>RMCP</b>	Range Munitions Consolidation Points
<b>RMD</b>	Range Management Department
<b>RMO</b>	Range Management Office
<b>RMS</b>	Rangewide Management Strategy
<b>ROD</b>	Record of Decision
<b>RS</b>	Resource-Specific
<b>SGCN</b>	Species of Greatest Conservation Need
<b>SOP</b>	Standard Operating Procedure
<b>SR</b>	State Route
<b>STAC</b>	South Tactical Range
<b>SWAP</b>	State Wildlife Action Plan
<b>TAC</b>	Tactical
<b>TEK</b>	Traditional Ecological Knowledge
<b>UA</b>	University of Arizona
<b>UDA</b>	Undocumented Alien
<b>USACE</b>	U.S. Army Corps of Engineers
<b>USAF</b>	U.S. Air Force
<b>USFWS</b>	U.S. Fish and Wildlife Service
<b>USGS</b>	U.S. Geological Survey
<b>USMC</b>	U.S. Marine Corps
<b>USN</b>	U.S. Department of the Navy
<b>USNVC</b>	U.S. National Vegetation Classification Standard
<b>UTC</b>	Urban Target Complex
<b>WFMP</b>	Wildland Fire Management Plan
<b>WFRHBA</b>	Wild Free-Roaming Horses and Burros Act of 1971

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## EXECUTIVE SUMMARY

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The Barry M. Goldwater Range (BMGR) in southwestern Arizona has served as a military training range since 1941. While federal agency responsibility for natural and cultural resources management has varied over previous years, the Military Lands Withdrawal Act (MLWA) of 1999 (Public Law 106-65) which renewed the approximately 1.7 million-acre military range, assigned this responsibility to the Secretaries of the Air Force and Navy for the eastern and western portions of the range, respectively. The U.S. Air Force (USAF) and U.S. Marine Corps (USMC), in partnership with the Department of the Interior (DOI) and the Arizona Game and Fish Department (AGFD), prepared an Integrated Natural Resources Management Plan (INRMP), in accordance with the MLWA; the Sikes Act Improvement Act (hereafter referred to as “Sikes Act”) (16 U.S. Code § 670a et seq., as amended through 2014); the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code §§ 4321-4370h, as amended through 1992); and other applicable laws. As provided by the Sikes Act, INRMPs must be reviewed as to operation and effect on a regular basis, but no less often than every five years. This 2018 INRMP is the second update for the BMGR and is the product of a thorough review of the 2012 INRMP in accordance with the five-year review cycle provided by the Sikes Act and in accordance with other updating procedures provided by the Sikes Act and the MLWA.

In accordance with the MLWA, the review was facilitated by the preparation of a Public Report that provides a summary of current use and conditions that have occurred since the 2012 INRMP was implemented. The use and conditions assessment includes military use, natural and cultural management actions, public access, public outreach, and environmental remediation actions. This revised INRMP was updated in consideration of the findings of the Public Report and consultations with partner agencies and Native American tribes. This update identifies management and other agency responsibilities and provides summaries of both the historical and current military uses of the BMGR. It also evaluates the current conditions of natural resources and identifies public access opportunities.

The USAF and USMC included a preliminary list of projects planned for the next five years to encourage feedback from the public, partnering agencies and Native American tribes. The resulting final project list is the heart of the 2018 INRMP update. The projects planned by the USAF and USMC address the 17 management elements, which are continued from the 2007 INRMP. The 17 management elements are categorized into five general types of actions.

1. Resource management—includes continuing the implementation of the natural resources inventory and monitoring plans
2. Motorized access—includes some modifications of the existing road network to better meet management needs that have been identified in the past five years, as described in Chapter 4.0, and continuing efforts to direct the public to use roads remaining open to public access
3. Public use—includes several management elements for providing recreational opportunities while protecting resources
4. Manage realty—includes addressing the public utility and transportation corridors that pass through the range and managing new right-of-way requests

5. Perimeter land use—involves monitoring land uses beyond the range to prevent encroachment and working with other agencies in regional planning

Each planned USAF or USMC action is identified by federal fiscal year (FY) for which funding is requested, an estimate of the funding needed for project completion, the expected life span of the project in years, and potential partners (see Tables 10.1 and 10.2 in Chapter 10). Implementation of this INRMP is subject to the availability of annual funding appropriated by Congress and none of the proposed projects or actions shall be interpreted to require obligations or payment of funds in violation of any applicable federal law, including the Anti-Deficiency Act of 1982 (31 U.S. Code § 1341).

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## CHAPTER 1 OVERVIEW AND SCOPE

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### 1.1 Purpose and Scope

The BMGR in southwestern Arizona is a U.S. military installation that encompasses approximately 1.7 million acres. The U.S. Air Force (USAF) and the U.S. Marine Corps (USMC) use the range for training military aircrews in the tactical execution of air-to-air and air-to-ground missions. To a lesser extent, the range is also used for other national defense purposes, most of which support or are associated with tactical air training. The USAF is the primary user of and managing agency for the eastern portion of the range, referred to as the BMGR East, and the USMC is the primary user of and managing agency for the western portion of the range, referred to as the BMGR West (Figure 1.1).

The BMGR is an essential national defense training area that produces the combat-ready aircrews needed to defend the nation and its interests for the USAF, USMC, U.S. Department of the Navy (USN), Air National Guard (ANG), Army National Guard (ARNG), and Air Force Reserve Command. The BMGR has been one of the nation's most productive military reservations for training tactical aircrews since World War II. As the nation's third largest military reservation, the BMGR has the training capabilities, capacities, and military air base support that provide the flexibility needed to sustain a major share of the country's aircrew training requirements now and into the foreseeable future.

The predominant use of the BMGR throughout its history has been to provide land and airspace for tactical air training. The Military Withdrawal Lands Act (MLWA) of 1999 (Public Law 106-65 [hereafter "MLWA of 1999"]), which superseded the MLWA of 1986 (Public Law 99-606) extends statutory authorization for the BMGR to October 2024 and continues the historical military purposes of the range. This act reserves the BMGR for use by the Secretaries of the Air Force and Navy for

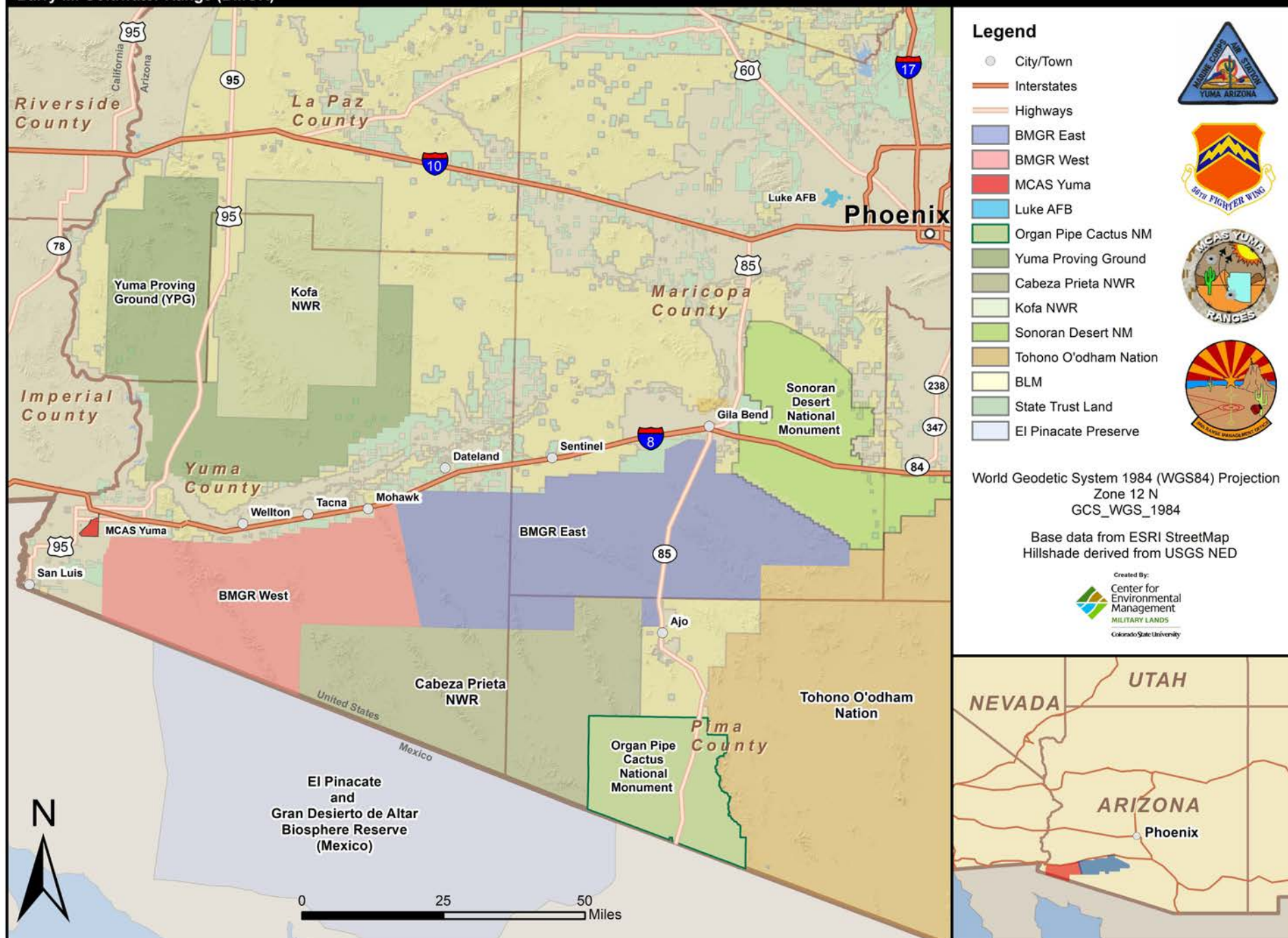
- an armament and high-hazard testing area;
- training for aerial gunnery, rocketry, electronic warfare, and tactical maneuvering and air support; and
- equipment and tactics development and testing and other defense-related purposes consistent with those specified in [Public Law 106-65 § 3031(a)(2)].

Parallel to its continuing value as an essential national defense asset, the BMGR is also nationally significant as a critical component in the largest remaining expanse of relatively unfragmented Sonoran Desert in the U.S. With the exception of State Route (SR) 85, the land is free of major developments and is ecologically linked to the Organ Pipe Cactus National Monument (NM), Cabeza Prieta National Wildlife Refuge (NWR), Sonoran Desert NM, and other lands administered by the U.S. Bureau of Land Management (BLM), as shown in Figure 1.1. Within this contiguous complex, the BMGR contributes almost 55 percent of the land area and is more than twice the size of any other component.

**Figure 1.1: General Location and Surrounding Land Ownership**

Barry M. Goldwater Range (BMGR)

2018-2023 Integrated Natural Resource Management Plan (INRMP)



This INRMP is a comprehensive planning document that outlines the significant natural resources of the BMGR and allows for multiple sustainable uses of those resources. The INRMP defines public access while ensuring that management and use are consistent with the military purposes of the range. These purposes are in accordance with the guidance provided for the BMGR by the MLWA and for all U.S. military installations by the Sikes Act Improvement Act (16 U.S. Code [U.S.C.] § 670a et seq., as amended through 2014) (hereafter referred to as “Sikes Act”). Further, management prescribed by the INRMP benefits threatened and endangered species consistent with federal and state recovery actions for these species under the Endangered Species Act (ESA) of 1973 (16 U.S.C. § 1531 et seq., as amended through 1988).

## 1.2 Management Philosophy

The USAF is the primary user of and managing agency for the BMGR East. Air Force Instruction (AFI) 32-7064, *Integrated Natural Resources Management* (USAF 1994b), provides the direction to implement Air Force Policy Directive 32-70, *Environmental Quality* (USAF 1994a), and Department of Defense (DoD) Instruction 4715.03, *Natural Resources Conservation Program* (DoD 2017a). AFI 32-7064 explains how to manage natural resources on USAF installations in accordance with applicable federal, state, and local laws and regulations. AFI 13-212, *Range Planning and Operations* (USAF 2015a), provides guidance on comprehensive range planning, including the integration of operational requirements and missions in preparation of INRMPs and ICRMPs. AFI 13-212 further provides that “Each INRMP and ICRMP will be written [in accordance with] AFI 32-7064 and AFI 32-7065 (USAF 2016) to support the current and future known mission requirements and will be amended as mission requirements change significantly.”

The USMC is the primary user of and managing agency for the BMGR West. Guidance for the USMC INRMP process is provided in Marine Corps Order (MCO) 5090.2A with changes 1–3 of the *Environmental Compliance and Protection Manual* (USMC 2013b), DoD 4715.03, and the *Handbook for Preparing, Revising, and Implementing Integrated Natural Resources Management Plans on Marine Corps Installations* (USMC 2004), hereafter referred to as the *Handbook*. This handbook guides the preparation, revision, and implementation of INRMPs in compliance with the Memorandum of Understanding (MOU) between the DoD, the U.S. Fish and Wildlife Service (USFWS), and the International Association of Fish and Wildlife Agencies and in accordance with the Sikes Act as implemented by the Office of the Secretary of Defense in *Updated Guidance on Implementation of the Sikes Act Improvement Act* (DoD 2002).

The DoD has modified its land management focus over the past two decades from the protection of individual species to ecosystem management. The two principal reasons for these changes are (1) the Sikes Act emphasis on promoting effective wildlife and habitat protection, conservation, and management; and (2) the concern that a disproportionate amount of attention in the past has been placed on managing the needs of individual, high-profile species in possible conflict with underlying ecosystem functions.

Ecosystem management incorporates the concepts of biological diversity and ecological integrity in a process that considers the environment as a complex system functioning as a whole, not as a collection of parts. In its application, a goal-driven approach is used to manage natural and cultural

resources in a manner that supports present and future mission requirements; preserves ecosystem integrity; is at a scale compatible with natural processes; is cognizant of nature's timeframes; recognizes social and economic viability within functioning ecosystems; is adaptable to complex and changing requirements; and is realized through effective partnerships among private, local, state, tribal, and federal interests. Traditionally, academic disciplines such as ecology, biogeography, population genetics, economics, sociology, philosophy, and others are synthesized and applied to the maintenance of biological diversity. Because ecosystem management is based on ongoing studies of ecology, biological diversity, and resources management, and because ecosystems are open, changing, and complex, this planning and management philosophy requires flexibility. Provisions to allow for adaptive management include monitoring, assessment, reassessment, and adjustment as necessary

DoD policy guidelines on ecosystem management are intended to promote and protect natural processes. Those guidelines, however, do not preclude active management intervention deemed necessary to address issues such as the removal of invasive species; supporting endangered species recovery or managing barriers to wildlife movement inside or outside of the installation. The DoD expects its resource managers to use the best available science, collaborative efforts with federal and state wildlife agencies, and consultations with outside experts and the public in reaching and implementing management decisions, including specific needs for intervention.

### 1.3 Authority

The MLWA of 1999 and the Sikes Act provide legal authority for the BMGR INRMP. The MLWA of 1999 provides that the Secretaries of the Navy, Air Force, and Interior jointly prepare an INRMP for the range. The INRMP shall "include provisions for proper management and protection of the natural and cultural resources of [the range], and for sustainable use by the public of such resources to the extent consistent with the military purposes [of the range]. . . ." (Table 1.1).

The MLWA of 1999 also specifies that the INRMP must be prepared and implemented in accordance with the Sikes Act. The Sikes Act sets forth resource management policies and guidance for U.S. military installations and requires the preparation of INRMPs for installations—including those, such as the BMGR, composed of withdrawn lands—with significant natural resources (Table 1.1).

The Sikes Act provides that "The Secretary of Defense shall carry out a program to provide for the conservation and rehabilitation of natural resources on military installations" and that an INRMP is to be prepared to facilitate implementation of that program. Consistent with the use of military installations to ensure the preparedness of the Armed Forces, the Sikes Act further specifies that the Secretaries of the military departments shall carry out a natural resources management program to provide for

- conservation and rehabilitation of natural resources on military installations;
- sustainable multipurpose use of the resources, which shall include hunting, fishing, trapping and non-consumptive uses; and
- public access—subject to safety requirements and military security—to military installations to facilitate use.

Table 1.1: INRMP elements specified in the Sikes Act and MLWA of 1999.

Sikes Act
<p>To the extent appropriate and applicable, provide for the INRMP elements listed below.</p> <ul style="list-style-type: none"> <li>• Wildlife management, land management, and wildlife-oriented recreation</li> <li>• Wildlife habitat enhancement or modifications</li> <li>• Wetland protection, enhancement, and restoration, where necessary for support of wildlife or plants</li> <li>• Integration of, and consistency among, the various activities conducted under the plan</li> <li>• Establishment of specific natural resources goals and objectives and time frames for proposed actions</li> <li>• Sustainable use by the public of natural resources to the extent that the use is not inconsistent with the needs of wildlife resources</li> <li>• Appropriate public access, subject to requirements necessary to ensure safety and military security</li> <li>• Enforcement of applicable natural resource laws (including regulations)</li> <li>• No net loss in the capability of military installation lands to support the military mission of the BMGR</li> </ul>
MLWA of 1999
<p>The INRMP shall include the provisions listed below.</p> <ul style="list-style-type: none"> <li>• Provide for the proper management and protection of the natural and cultural resources of withdrawn lands.</li> <li>• Provide that any hunting be conducted in accordance with the provisions of 10 U.S.C. § 2671 (the general military policy for hunting, fishing, and trapping on military reservations).</li> <li>• Identify current the BMGR test and target impact areas and related buffer or safety zones.</li> <li>• Provide necessary actions to prevent, suppress, and manage brush and range fires that occur within or outside the BMGR as a result of military activities.</li> <li>• Provide that all gates, fences, and barriers constructed are designed and erected to allow wildlife access to the extent practicable and consistent with military security, safety, and sound wildlife-management use.</li> <li>• Incorporate any existing management plans pertaining to the BMGR, to the extent that INRMP preparers mutually determine that incorporation of such plans into the INRMP is appropriate.</li> <li>• Include procedures to ensure that the periodic reviews of the plan under the Sikes Act are conducted jointly by the Secretaries of the Navy, USAF, and Interior, and that affected states, Native American tribes, and the public are provided a meaningful opportunity to comment upon any substantial revisions to the plan that may be proposed.</li> <li>• Provide procedures to amend the plan as necessary.</li> </ul>

### 1.3.1 Agency Responsibilities

The MLWA of 1999 transferred federal jurisdiction for managing the natural and cultural resources of the BMGR from the Secretary of the Interior to the Secretaries of the USAF and Navy. However, the

Secretary of the Interior retains some oversight responsibilities as well as a role in updating the INRMP. The Secretary of the USAF, who now has primary surface-management responsibility for the BMGR East, delegated local command and control for the BMGR East to the Commander of the 56th Fighter Wing (56 FW) at Luke Air Force Base (AFB). As a result, Luke AFB also assumes responsibility for preparing and implementing the INRMP for the BMGR East. Similarly, the Secretary of the Navy, who has primary surface-management responsibility for the BMGR West, delegated local command and control for the BMGR West and responsibility for preparing and implementing the INRMP for that portion of the range to the Commanding Officer of Marine Corps Air Station (MCAS) Yuma. Therefore, the Commanders of Luke AFB and MCAS Yuma provide local command and control for military operations, public access and use, and resource-management activities on a daily basis for their respective portions of the BMGR.

Although the USAF and USMC hold the primary surface-management responsibility for the BMGR, the Secretary of the Interior and AGFD are responsible for its natural resources. The Secretary of the Interior was assigned a role by the MLWA of 1999 to assist the Secretaries of the USAF and Navy in jointly preparing the INRMP and conducting periodic reviews of the INRMP for updating the plan as necessary. This role has been delegated to the Manager of Cabeza Prieta NWR.

As provided by the MLWA of 1999, the Secretary of the Interior also has the authority to transfer land management responsibility for the BMGR from the USAF and/or USMC to the DOI if the Secretary determines that (1) the USAF or USMC has failed to manage natural and cultural resources in accordance with the INRMP, and (2) this failure is resulting in significant and verifiable degradation of the natural or cultural resources of the BMGR. Another provision of the MLWA of 1999 directs the USAF and/or USMC to consult with the DOI before using the BMGR for any purpose other than the purposes for which it was withdrawn and reserved. The Arizona State Director of the BLM has the local responsibility for representing the DOI in such oversight activities and consultations.

### **1.3.2 Arizona Game and Fish Department Authority**

The state of Arizona has primary jurisdiction over wildlife management within the BMGR, except where pre-empted by federal law. Nothing in the MLWA of 1999 or Sikes Act either diminishes or expands the jurisdiction of the state with respect to wildlife management. In addition, AGFD is the responsible state agency for providing safe opportunities for off-highway vehicle (OHV) recreation in Arizona.

Established in 1929 under Title 17 of the Arizona Revised Statutes (ARS), AGFD is governed by the Arizona Game and Fish Commission. Under the provisions of ARS 17-231, the Arizona Game and Fish Commission establishes policy for the management, preservation, and harvest of wildlife. Under the umbrella of the Commission, the AGFD's mission is "To conserve, enhance, and restore Arizona's diverse wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations" (AGFD 2017a).

The primary wildlife management responsibilities of AGFD were recognized in the 2007 INRMP and continue without change to include

- developing and maintaining habitat assessment/evaluation, protection, management, and

enhancement projects (e.g., artificial water developments and Sonoran pronghorn [*Antilocapra americana sonoriensis*] food plots);

- conducting wildlife population surveys;
- managing wildlife predators and endangered species or special status species (management of federally listed endangered species is a responsibility shared with the USFWS);
- enforcing hunting regulations;
- establishing game limits for hunting, trapping, and non-game species collection;
- issuing hunting permits; and
- assisting and advising the DoD to manage OHV use in terms of habitat protection and advocating for user opportunities.

In managing the state's wildlife, AGFD continues to make determinations on the appropriateness and need to transplant wildlife into or out of the BMGR. Should wildlife transplants affecting the BMGR be proposed, appropriate environmental studies and regulatory compliance would be completed, as required, prior to implementing any specific proposal.

### 1.3.3 U.S. Border Patrol Authority

The entire range is potentially subject to the presence of undocumented aliens (UDAs) and smuggling traffic because of its proximity to the international border (Figure 1.1). Therefore, the range is heavily patrolled by U.S. Customs & Border Protection (CBP) agents seeking to interdict and apprehend smugglers and illegal entrants. CBP is also charged with installing border infrastructure as needed to deter illegal crossings and maintaining operational control of the border (*Homeland Security Act of 2002*, P.L. 107-296, 6 U.S.C. §§ 101 et seq. [U.S. Department of Homeland Security 2002]; Section 102 of the *Illegal Immigration Reform and Immigrant Responsibility Act of 1996* (Public Law 104-208, as amended); 8 U.S.C. § 1103, *Aliens and Nationality*; and other acts). Within CBP, the U.S. Border Patrol (BP) is the delegated authority for “detecting and preventing the entry of terrorists, weapons of mass destruction, and unauthorized aliens into the country, and to interdict drug smugglers and other criminals between official points of entry.” Within the BMGR East, the BP coordinates with Range Management Office (RMO) Conservation Law Enforcement Officers (CLEOs) and Pima and Maricopa County Sheriff Offices. Within the BMGR West, the BP coordinates with Range Management Department (RMD) CLEOs, Yuma County Sheriff's Office, and Yuma County Search and Rescue.

In January 2007, the Department of Homeland Security waived numerous environmental, natural and cultural resources conservation actions and endangered species protection laws in order to ensure the expeditious construction of the border fence along the international boundary within the BMGR and adjacent public lands (Federal Register 2007), (Sikes Act; MLWA; National Environmental Policy Act (NEPA) 42 U.S.C. § 4321 et seq.; ESA 16 U.S.C. § 1531 et seq.; Clean Water Act 33 U.S.C. § 1251 et seq.; Wilderness Act, 16 U.S.C. § 1131 et seq.; National Historic Preservation Act of 1966 16 U.S.C. § 470 et seq.; National Wildlife Refuge System Administration Act, 16 U.S.C. §§ 668dd-668ee; and Administrative Procedure Act 5 U.S.C. § 551 et seq.; Haddal et al. 2009).

## 1.4 Integration with Other Plans

“Mission requirements and priorities identified in [this INRMP] shall, where applicable, be integrated in other environmental programs and policies” (USMC 2004). Implementation of this INRMP will support and sustain the military mission of the range with no net loss in the capability of the BMGR lands to support the mission. The INRMP is incorporated (i.e., referenced as appropriate) into the BMGR East *Comprehensive Range Plan* (CRP, in prep.) and MCAS Yuma Range and Training Areas Standard Operating Procedures (SOP) Station Order 3710.6J (USMC 2014).

In accordance with the MLWA of 1999, the INRMP provides for protection of the cultural resources of BMGR by prescribing that natural resources management actions be fully supportive of and compliant with the prescriptions of the ICRMP for the range (see Section 7.14). INRMPs and ICRMPs for military installations are prepared as separate but integrated plans rather than as components of a single plan. The following ICRMP goals are also adopted as goals in the INRMP.

- Support military operations through proactive management of cultural resources.
- Fulfill legal obligations for protection of historic properties.
- Address Native American concerns, including disposition of cultural items.

AFI 13-212 requires USAF installations to review and coordinate all range-related documents, including INRMPs, ICRMPs, and subordinate plans to ensure compatibility with the CRP and other range plans. INRMPs often incorporate subordinate plans that address installation actions such as pest control or wildfire suppression. Furthermore, each INRMP and ICRMP shall be written to support the mission requirements identified in the CRP and shall be amended as mission requirements change significantly.

MCO 5090.2A (USMC 2013b) requires that USMC INRMPs and the installation master plan shall identify the boundaries of endangered and threatened species habitat, wetlands, and other geographically specific areas important to natural resources stewardship. MCO 5090.2A also requires that the Wildland Fire Management Plan (WFMP) shall be incorporated into or consistent with the INRMP and ICRMP and that the Integrated Pest Management Plan (IPMP) is reviewed by the Natural Resources Manager for consistency with the INRMP.

Since the completion of the 2012 INRMP, several subordinate plans have been prepared and implemented. These plans, listed below, are referenced throughout this INRMP.

- CRP (East) (in prep.)
- Range and Training Area SOP (West) (USMC 2014)
- ICRMP (56th Range Management Office [56 RMO] 2009)
- IPMP (Luke AFB 2015)
- WFMP (In-progress both East and West)

## 1.5 Interagency Collaboration and Intergovernmental Consultation

A previously existing MOU that established the Barry M. Goldwater Range Executive Council (BEC) was amended in February 2001 for the purpose of “providing a forum for collaboration by the statutory decision makers in the management of resources and their uses. . . .” within the BMGR. The BEC, a local management ad hoc committee, consists of a local senior functional manager for the USAF, USMC, BLM, USFWS, AGFD, CBP, and directors for the adjacent Sonoran Desert NM, Organ Pipe Cactus NM, and Cabeza Prieta NWR. The USAF, USMC, and other BEC members meet six times each year to identify substantive issues, conflicts, or other matters for consideration by this group of managers and agency decision-makers with direct responsibility for, or potential impact upon, lands or resources in the BMGR region. BEC members recognize that the exchange of views, information, and advice relating to the management of natural and cultural resources will help to identify the best practicable solutions for issues identified.

In accordance with provisions in the MLWA of 1999, the Secretaries of the Navy, Air Force, and Interior established an Intergovernmental Executive Committee (IEC) in December 2001 to provide a forum solely for the purpose of exchanging views, information, and advice relating to the management of the natural and cultural resources within the BMGR. The IEC membership includes those agencies and Native American tribes that may have a direct responsibility for, potential impact upon, or direct interest in the lands or resources of the BMGR. IEC meetings are open to the public and provide non-IEC participants with opportunities to present opinions regarding the BMGR management policies and procedures to the IEC for discussion and possible action recommendations.

## CHAPTER 2 INSTALLATION PROFILE

### 2.1 Installation Overview

The BMGR is located in southwestern Arizona in portions of Yuma, Maricopa, and Pima counties (Figure 1.1). Portions of the BMGR East are located in each of the three counties; the BMGR West is located entirely in Yuma County. The range is approximately 133 miles across on its longest east-west axis. The north-south axes vary in width: at the western end, the north-south axis is approximately 15 miles wide, is generally 18 to 28 miles wide through much of the length of the range, and then narrows to about 4 miles at its eastern end.

The effective size of the BMGR for supporting military aviation training is nearly 40 percent larger than its surface area, as the restricted airspace that overlies the range is about 2,766,700 acres. Also contributing to the effective size of the BMGR is the adjacent Cabeza Prieta NWR, which the MLWA of 1999 stipulates must be managed to support certain military aviation training needs. The refuge, which is about 860,000 acres, is entirely within the footprint of the range's restricted airspace. The restricted airspace over the refuge extends from the ground surface to 80,000 feet above ground level (AGL) and is fully incorporated in military aviation training.

Additionally, there are more than 85,000 cubic nautical miles of special use airspace used for military operations beyond the airspace above BMGR, Luke AFB, and MCAS Yuma, including not only the adjacent Federal lands, but also Tohono O'odham lands and other parts of southwestern Arizona, as well as a region northeast of Flagstaff, AZ (see section 2.1 in Volume 2 [Luke AFB INRMP] and Volume 3 [MCAS Yuma Installation Overview] in this document for details).

Table 2.1: Installation profile.

<b>Office of Primary Responsibility</b>	56 RMO for the BMGR East and RMD for the BMGR West have overall responsibility for implementing the natural resources management program and are the lead organizations for monitoring compliance with applicable federal, state and local regulations.
<b>Point of Contact/ Natural Resources Manager</b>	<p><b>BMGR East</b> 56 RMO/ESMN 7101 Jerstad Lane, Building 500 Luke AFB, AZ 85309 623-856-8487</p> <p><b>BMGR West</b> Natural Resource Specialist RMD P.O. Box 99134/Building 151 MCAS Yuma, AZ 85369-9134 928-269-6724</p>

Table 2.1: Installation profile.

<b>State and/or Local Regulatory Points of Contact</b>	<b>USFWS Ecological Services</b> Assistant Field Supervisor for Southern Arizona 201 N Bonita, Ste. 141 Tucson, AZ 85745 520-670-6144  <b>AGFD</b> Regional Supervisor-Region IV 5000 W. Carefree Highway Phoenix, AZ 85086-5000 602-942-3000
<b>Total Acreage Managed by Installation</b>	BMGR—~1.7 million acres BMGR East—~1 million acres BMGR West —~700,000 acres
<b>Biological Opinions</b>	<ul style="list-style-type: none"> <li>• U.S. MCAS-Yuma in the Arizona Portion of the Yuma Training Range Complex (Barry M. Goldwater Range West), consultation number 02-21-95-F-0114, issued on 17 April 1996, with reinitiations issued on 16 November 2001, 6 August 2003, 21 October 2009, and 3 November 2015.</li> <li>• Luke Air Force Base Use of Ground-Surface and Airspace for Military Training at BMGR, consultation number 02-21-96-F-094, issued 2 August 1997, with reinitiations issued on 16 November 2001, 6 August 2003, 3 May 2010, and 14 March 2014.</li> <li>• Western Army National Guard Aviation Training Site Expansion Project, consultation number 02-21-92-F-0227, issued on 19 September 1997 with reinitiations and revised opinions dated 16 November 2001 and 6 August 2003.</li> <li>• BMGR Integrated Natural Resources Management Plan, consultation number 22410-2005-F-0492, issued on 26 August 2005, with reinitiations issued on 7 January 2013 and March 14, 2014.</li> </ul> <p>(See <a href="https://www.fws.gov/southwest/es/arizona/Biological.htm">https://www.fws.gov/southwest/es/arizona/Biological.htm</a> for access to Biological Opinions.)</p>
<b>Resource Management Programs</b>	<ul style="list-style-type: none"> <li>• Threatened and Endangered Species</li> <li>• Species of Greatest Conservation Need</li> <li>• Wildlife</li> <li>• Bird/Wildlife Aircraft Strike Hazard (BASH) Program</li> <li>• Invasive Species</li> <li>• Integrated Pest Management</li> <li>• Soil Conservation</li> <li>• Cultural Resources Management Program</li> </ul>

### 2.1.1 BMGR History

The BMGR<sup>1</sup> was initially established on 5 September 1941 to support new Army Air Force<sup>2</sup> flying training programs at Luke Field<sup>3</sup> and Williams Field<sup>4</sup> as the U.S. prepared its armed forces prior to deploying them to fight in World War II. The initial parcel of land set aside for the range included most of what is now the BMGR East. By March 1943, additional parcels had been added to the range to expand the training capacity of the eastern portion of the range and support flight training programs to the west at Yuma Army Air Base. Three key characteristics of the range were critical to its intended mission. The range was in close flying proximity to the air bases that it served, was uninhabited and undeveloped, and was large enough to be divided into several sub-areas that could safely support simultaneous but independent training missions. The proximity of the BMGR to military air bases and its size continue to be two of the most important assets of the range for supporting contemporary military training. Military use has continued to preclude habitation or development, with the exception of infrastructure needed for military use.

The Yuma Army Air Base<sup>5</sup> was developed as a training command site separate from those at Luke and Williams fields. This base, and the addition of the western parcels to the gunnery and bombing range, established a second area of aircrew training operations that were independent from those conducted in the eastern range areas. This basic east-west split of range resources has been continued ever since and is currently represented by the BMGR East and the BMGR West divisions of the range.

President Franklin D. Roosevelt originally designated the BMGR through authority provided to the president at that time to execute federal land withdrawals.<sup>6</sup> The BMGR remained under

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<sup>1</sup> BMGR and its subparts have had a number of official and unofficial names including “Ajo-Gila Bend Aerial Gunnery Range,” “Williams Bombing and Gunnery Range,” “Luke-Williams Bombing and Gunnery Range,” “Gila Bend Gunnery Range,” “Yuma Aerial Gunnery and Bombing Range,” and “Luke Air Force Range.” Barry M. Goldwater Air Force Range became the official name of the range with the passage of the MLWA of 1986. This was shortened to BMGR with the passage of the MLWA of 1999. This Act also designated BMGR East and BMGR West as the names of the eastern (Air Force) and western (Marine Corps) components, respectively.

<sup>2</sup> The USAF was established as an independent service on 18 September 1947. The Air Force evolved from the Army Air Service, which became the Army Air Corps in 1926, and then the Army Air Force in June 1941.

<sup>3</sup> Luke Field was renamed Luke AFB in January 1951.

<sup>4</sup> Williams Field was renamed Williams AFB after 1947. Williams AFB was closed in 1993.

<sup>5</sup> Yuma Army Air Base was renamed as Yuma Air Base in 1951 and then designated as Vincent AFB in 1956. In 1959, Vincent AFB became Marine Corps Auxiliary Air Station, Vincent Field, Yuma, and in 1962 it became MCAS Yuma.

<sup>6</sup> “Withdrawing” federal lands is to withhold them by executive or legislative action from settlement, sale, location, or entry under some or all of the general land, mining, and mineral laws in order to limit or prohibit activities normally permitted under those laws. Withdrawn lands were then reserved for

administrative withdrawal until 1986 when Congress passed the MLWA of 1986 (Public Law 99-606), which renewed the range for military use for another 15 years and provided guidance for its use and management. The MLWA of 1986 was superseded by the MLWA of 1999 (Public Law 106-65 1999), which renewed the range for an additional 25 years (until October 2024).

### **2.1.1.1 Military Use History**

The predominant use of the BMGR throughout its history has been to provide land and airspace for air combat training. During World War II, the training emphasis was on aerial gunnery. The eastern range area was used primarily for advanced aircrew training in fighter aircraft, including air-to-air gunnery, air-to-ground gunnery (i.e., strafing), and air combat flight maneuvers. Training in bombing ground targets was added to the curriculum in the last years of the war. The western range area was also used for training fighter aircrews, but the principal activity was air-to-air gunnery training for bomber aircrews.

War department development during World War II was limited primarily to three auxiliary air bases—at Gila Bend, Ajo, and Dateland—and 14 outlying auxiliary airfields. Student aircrews were sent to the auxiliary air bases for concentrated periods of instruction in gunnery and, for some classes, bombing training. The base at Gila Bend Air Force Auxiliary Field (AFAF) is the only one of the three auxiliary air bases that is inside the modern boundaries of the BMGR and continues to operate as a military installation. The former auxiliary base at Ajo is now Eric Marcus Municipal Airport, which is a public-use facility. The former auxiliary base at Dateland is now a privately owned airport that is restricted to authorized users.

Available evidence indicates that the 14 outlying auxiliary airfields were day-use-only facilities where personnel were not permanently stationed. These airfields likely were used as locations to rotate aircrews and, possibly, to refuel or rearm aircraft between successive gunnery training missions. Eight of the 14 outlying auxiliary airfields remain within the modern boundaries of the BMGR; the other six are in locations that are no longer part of the range. Three of the eight outlying auxiliary fields that remain inside the BMGR continue to be used for military purposes. The USMC continues to use Auxiliary Field 2 (AUX-II), located at the far western end of the BMGR West, as a day-use facility. Within the BMGR East, Stoval Airfield, located southwest of Dateland near the northern boundary of the BMGR, and AUX-6, located west of Gila Bend AFAF, continue to be used for occasional training activities.

The BMGR was seldom used for several years following World War II. The outbreak of the Korean War and the growing concern regarding the Cold War prompted reactivation of the gunnery range, Luke AFB (formerly Luke Field), Gila Bend AFAF at the gunnery range, and Yuma AFB in early 1951. Reactivation of the range required substantial repairs and new construction. New target developments transformed the BMGR East from a predominantly aerial gunnery training facility into a complex that could support all phases of tactical air combat training. Instruction in air-to-air

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specified public (or governmental) purposes. For example, military reservations are withdrawn and reserved for national defense purposes. The Defense Withdrawal Act of 1958 (P.L. 85-337) provides that an Act of Congress is required for land withdrawals for military purposes that are more than 5,000 acres in aggregate.

gunnery continued to be an important range function, but the new era also brought training in air-to-air missile firing and an expanded emphasis on the use of aircraft for air-to-ground attack using guns, missiles, rockets, and bombs. Development of the range to support these new training missions included four ground-controlled subranges; five independently located vehicle convoy subranges; a camouflage subrange; a realistic tactical subrange; an air-to-air firing subrange; and a napalm (or fire-bomb) subrange.

USAF use of the BMGR East area during the middle of the Cold War and the Vietnam War era (1960–1974), continued to focus on the training of aircrews to fly fighter and attack aircraft. The tactical, ground-controlled, air-to-air gunnery, and air-to-air maneuvering subranges that had been established during the 1950s were used to provide the necessary training support. However, the subranges were modified throughout this period to meet evolving training needs. By 1960, North, South, and East tactical (TAC) ranges were well established in terms of the ground surface areas dedicated as ordnance impact locations. By 1974, the partitioning of the BMGR East into the four manned ranges, three tactical ranges, and the air-to-air were completed. They are still in use today.

BMGR East was redeveloped and upgraded in the second half of the 1970s to support training that would more realistically resemble potential threat areas. East TAC Range was redeveloped to simulate a European theater, North TAC Range to simulate a Korean theater, and South TAC Range to simulate a Middle Eastern theater. An electronic warfare range was installed to realistically simulate the types of air defense threats that aircrews could encounter in actual combat. The USAF also installed an electronic tracking and telemetry range (now referred to as the Air Combat Tactics System range). These upgrades and additions generally supported aircrew training needs at the BMGR East through the end of the Cold War and the first Persian Gulf War in 1991.

The primary use of the western range area from 1950 to 1958 was to support an air-to-air gunnery and air-to-air rocket firing proficiency program of the USAF Air Defense Command (ADC). This program was based at the Yuma AFB. ADC was responsible for training and deploying the fighter interceptor squadrons that defended the U.S. against airborne attack. The range became the single location to which all ADC units deployed annually for proficiency training. The focus of the proficiency program from 1951 to 1954 was on air-to-air gunnery. No new development of the BMGR West surface area is known to have been necessary to support the ADC proficiency training mission.

The USMC became a regular user of the BMGR in 1959 when Vincent AFB was transferred to the USMC and became Marine Corps Auxiliary Air Station Yuma (MCAS Yuma from 1962 forward). In contrast to USAF use of the BMGR, which had emphasized and continues to emphasize student aircrew instruction, USMC training focused and continues to focus primarily on operational aircrews and units. USMC training stressed air-to-air tactics, gunnery, and missile firing, as well as air-to-ground weapons use. Two target complexes were constructed within the far-western part of the range to support air-to-ground weapons training. A rifle range and a built-up training and administrative site, later called the Cannon Air Defense Complex, were also constructed in this area. These latter two facilities are still in use.

Through the mid-1970s, the area of the BMGR West east of the Gila and Tinajas Altas Mountains was regularly used as a fallout area for aerial gunnery and missile training. Today, this use only occurs during special and infrequent training events. Also during that time, electronic tracking and

telemetry instruments were installed in the eastern portions of the BMGR West to form the electronic architecture of a Southwest Tactical Training Range, which remains in use and is composed of ground-based electronic instrument sites used to track, record, and replay the actions of up to 36 aircraft simultaneously as they participate in air-to-air or air-to-ground combat training.

The primary training emphasis within the BMGR West during the late Cold War and first Persian Gulf War era continued to be readiness training for combat-qualified aviation units. Ground units with a role to play in the integration of USMC air-ground combat teams were also incorporated in some exercises to enhance the realism of the training.

Since the early 1990s, there has been a decline in the need for live air-to-air gunnery and missile firing exercises, but neither the USAF nor the USMC has reduced its requirements for live air-to-ground weapons training. Both the USAF and USMC have added electronic instrumentation that simulates air defense systems and refines their targets to keep pace with evolving air combat tactics and threats.

### **2.1.1.2 Land Management History**

The land management history of the BMGR differs from that of most federal public lands controlled by a single federal agency (such as the BLM, USFWS, National Park Service [NPS]) where resource management is the primary mission. Typical federal agency models are based on a clear purpose and patterns of management are established by the agency's mission, regulations, past management plans and practices, past and current land uses, resource conditions, and public involvement. Management of the BMGR has differed from this model in several important ways. First, there were no clear DoD or DOI resource management priorities specific for the range until the 1980s. Moreover, there was no clear authority for resources management, at either federal or state levels. As a result, there was no development of mutually held goals or coordination of purpose. Second, a comprehensive natural resources management plan was prepared in 1986 and fully implemented in 1990; subsequently, INRMPs were completed in 2007, 2012, and 2018. Finally, at many points in the range's history, management agencies have found themselves with competing or conflicting responsibilities, legal guidance, goals, and purposes without an effective means of resolving these issues.

Primary federal management responsibilities for BMGR lands since 1940 were (or are) as follows.

1. Prior to September 1941: General Land Office and U.S. Grazing Service (these two agencies were merged in 1946 to form the BLM).
2. September 1941 to December 1958: USAF, full responsibility for the entire range.
3. January 1959 to November 1986: USAF military operations management of the BMGR East; USN/USMC military operations management of the BMGR West.
4. November 1986 (MLWA of 1986) to November 6, 2001: No change of military operations of the BMGR. BLM had land management responsibility for the entire range.
5. November 6, 2001 (MLWA of 1999) to November 6, 2024: No change in military operations of the BMGR. The Secretary of the Air Force and Navy have land management responsibility for the entire range.

Considerable progress has been made in recent years towards resolving resource management issues. The MLWA of 1999 clearly established that the USAF and USMC would be responsible for managing the natural resources of the range in accordance with the Sikes Act; thus, the 2007 INRMP became the first plan to be implemented without conflicting federal management guidance. The 2012 update represented the continuation of the implementation of the Sikes Act provisions and provided direction for proper management and protection of cultural and natural resources on the withdrawn lands. The 2018 update of the INRMP provided herein maintains this direction and includes planned projects specific to the FY 2019-2023 timeframe in the five-year INRMP cycle.

### **2.1.2 BMGR Missions**

The primary mission of the BMGR remains unchanged and has become more critical with the beddown of F-35s at both installations. Student and operational aircrews training occurs throughout the range. However, the preeminent activity at BMGR East is advanced training for student aircrews transitioning to frontline combat aircraft and, at the BMGR West, readiness training for aircrews in operational combat is predominant. In addition, the BMGR serves the USN, Air Force Reserve Command, ANG, and ARNG in these capacities. Other installations that regularly practice at BMGR include MCAS Miramar, Davis-Monthan AFB, Silverbell Army Heliport, and Arizona ANG Base at Tucson International Airport. In addition to regular users, “casual user” training deployments that originate from active duty, reserve, and ANG flying units from other areas of the U.S. and allied units from overseas also train at the range.

### **2.1.3 Surrounding Communities**

The perimeter of the BMGR is approximately 350 miles. The adjunct lands are predominantly rural, undeveloped, and dominated by federal and tribal lands. Federal lands under the jurisdictions of the BLM, Bureau of Reclamation, or USFWS are dedicated to long-term conservation purposes or a combination of conservation and multiple public uses. These lands abut with approximately 52 percent of the BMGR perimeter (see Figure 1.1). Additionally, the Tohono O'odham Nation shares 7 percent and private or State Trust lands share approximately 30 percent of the perimeter. The remaining 11 percent of the perimeter abuts the international boundary between the U.S. and Mexico.

Private, State Trust, and BLM lands are predominant along the northern boundary of the BMGR from Gila Bend to Yuma along Interstate Highway 8 and along the western range boundary in the vicinity of Yuma. Much of this land has been converted to agriculture over the past decades. Agricultural crop production is particularly prevalent west of Gila Bend near the towns of Aztec, Tacna, Wellton, and Yuma. It is anticipated that new urban development will grow faster than agriculture and change the mix of land use in the future.

The largest adjacent communities and their population estimates (U.S. Census 2017) are summarized in Table 2.2. The majority of the population near the BMGR resides in Yuma County. In 2007, when the housing market collapsed, Yuma County, like most of the nation, experienced a decline in population growth and construction activity (Yuma County Department of Development Services 2012). Before the recession, growth rates for Yuma County had been both robust and predictable, with an average growth rate of 3.84 percent between 1980 and 2000 (Yuma County 2012). Since 2010, the county population growth rate has exceeded the historical average. According to the U.S.

Census, the estimated annual population growth rate was about 5 percent from 2010–2017 (U.S. Census Bureau 2017).

Table 2.2: Community populations surrounding BMGR, 2010–2017.

City	2010 U.S. Census Data	Recent Population Estimates
City of Yuma, Yuma County	93,064	96,502 <sup>1</sup>
Wellton, Yuma County	2,882	2,947 <sup>2</sup>
Tacna, Yuma County	602	674 <sup>2</sup>
Gila Bend, Maricopa County	1,922	2,069 <sup>1</sup>
Ajo, Pima County	3,304	3,696 <sup>2</sup>

<sup>1</sup> 2017 U.S. Census population estimates (as of 1 July 2017) (U.S. Census Bureau 2017).

<sup>2</sup> 2016 U.S. Population estimates unavailable; estimates retrieved from the 2010–2016 American Community Survey at [https://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml](https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml).

The federal government owns approximately 80 percent of the land in Yuma County (Yuma County 2012). Military and agricultural lands represent the two largest segments of unincorporated Yuma County, with approximately 40 percent used for military purposes. Of the remaining 60 percent, 47 percent is used for agricultural purposes (Yuma County 2012).

The community of Gila Bend lies just north of the BMGR East. It has a population of 2,071 and is the site of a 280-megawatt solar-generating station (Gila Bend 2017). The Gila Bend planning area includes approximately 175,000 acres of vacant, relatively flat terrain. Existing land use in Gila Bend is concentrated in town; scattered land uses include large lot residential, energy generation, agriculture, and sand and gravel extraction. No master planned communities are located within the unincorporated portion of the planning area (Gila Bend 2017).

Ajo, in Pima County, is a small community located just south of the BMGR East. Ajo is a former copper-mining hub that has recently experienced community growth as BP agents and other government workers have moved into the area. The community population increases dramatically during the winter months as people arrive from farther north to enjoy the warmer climate of Arizona.

Tohono O'odham Nation land encompasses approximately 2.8 million acres southeast of the BMGR. The Nation is organized into 11 districts, with Hickiwan District abutting the BMGR's most southeastern border. Hickiwan District's on-reservation population is 817. The off-reservation population is 1,259 (Tohono O'odham Nation 2016). The land use includes ranching, livestock grazing, and seasonal livestock camps.

In 2010, the 56 FW and Tohono O'odham Nation signed an MOU to create a framework for consultation on DoD activities at the BMGR East. The MOU formalizes the consultation process but

recognizes that the consultation process, in connection with the INRMP and ICRMP, is not included in its purview. In April 2015, this MOU was renewed for an additional five-year period.

#### **2.1.4 Local and Regional Natural Areas**

The BMGR and adjacent government lands include a wide array of biologically diverse ecological gradients that characterize the interface between the Arizona Upland and Lower Colorado River Valley in the Sonoran Desert. Once considered a barren wasteland, the Sonoran Desert is now recognized as the most biologically diverse of the great North American deserts. In its entirety, the Sonoran Desert encompasses about 100,000 square miles in southwestern Arizona, southeastern California, Baja California, and western Sonora (Arizona-Sonora Desert Museum 2017). It is the most tropical of the three North American warm deserts (Chihuahuan, Mojave, and Sonoran) and hosts the greatest number of plant communities (Arizona-Sonora Desert Museum 2017).

The BMGR, Cabeza Prieta NWR, Organ Pipe Cactus NM, Sonoran Desert NM, and contiguous BLM-administered lands occupy landscapes that are ecologically interdependent to the degree that management working to conserve ecosystem functions and biological diversity in one of these areas benefits adjacent areas. Further, ecosystem linkages within the BMGR East also extend into contiguous, largely natural areas of Tohono O'odham Nation lands.

Lands adjacent to the BMGR that offer the most recreational opportunities include the Sonoran Desert NM, Cabeza Prieta NWR, and El Pinacate and Gran Desierto de Altar Biosphere Reserve, Mexico. The Sonoran Desert NM is located along the northeast corner of the range near East Tactical Range (ETAC); the portion of the monument adjacent to the range was formerly part of the BMGR, but it was relinquished to the BLM with the passage of the MLWA of 1999. This area is currently managed by the BLM for semi-primitive recreational opportunities and motorized access to some of the land. The Cabeza Prieta NWR and Wilderness is located along portions of the BMGR's southern border (Figure 1.1).

All of the areas in which recreation is most likely to occur are predominantly undeveloped desert. Most non-agricultural areas are also undeveloped desert, including the land in Mexico south of the BMGR boundary and much of the land north of the BMGR along I-8, particularly between the communities of Gila Bend and Mohawk.

## **2.2 Physical Environment**

### **2.2.1 Climate**

The Southwest region of the U.S. is characterized by a hot and arid variable climate that is strongly influenced by its geographic location and positioning between two circulation regimes. Most of the annual precipitation typically occurs during mid-winter storms or late summer monsoons. Based on long-term weather patterns, average annual rainfall in the higher elevations along the easternmost portion of the BMGR may approach 9 inches and, in the western extremes of the range near Yuma, average annual rainfall is typically no more than 3 inches. Across the entire range, average rainfall is less than 5 inches per year. In the Sonoran Desert, however, rainfall patterns are irregular. As a result,

some range locations may receive little or no rain during the same season or year in which other areas receive average or above-average precipitation.

The Sonoran Desert is also subject to frequent and sometimes prolonged drought. As a result, some of the BMGR's interior valleys receive an average of only 0.5 inches of rainfall annually. Overall effects of the minimal rainfall are exacerbated by high temperatures and regional evaporation transpiration potentials that greatly exceed all known rainfall regimes. Summer daytime temperatures often are in excess of 110 degrees Fahrenheit and annual evaporation potentials, which vary from more than 86 inches in the western part of the range to about 72 inches in the eastern, greatly exceed the available precipitation. When the stable weather patterns that promote aridity in the BMGR region periodically break down, all or portions of the range may receive two to three times the normal annual rainfall, sometimes in only one or a few storms.

The Southwest has become warmer and drier over the past century, and projections indicate this trend will continue into the twenty-first century (Overpeck et al. 2013). Droughts will become more severe and precipitation extremes in winter are expected to become more frequent and more intense (Overpeck et al. 2013). Significant changes in climate in this region will have broad impacts on ecosystems and consequences for biodiversity (Bagne and Finch 2012).

### **2.2.1.1 Regional Climate Monitoring Program**

In the fall of 2011, the BMGR East began a climate monitoring program and installed a network of 12 communication-grade weather stations (Campbell Scientific), manual-download data loggers, and manual-read precipitation storage gauges. In addition to real-time stations, the BMGR East has maintained existing rain gauges and manual-download data loggers to increase the number of climate-monitoring points and provide a more spatially explicit understanding of climate variables. These stations transmit data in real time and collect measurements on the following climatic variables (Black 2015).

- Temperature
- Relative humidity
- Precipitation
- Wind speed
- Wind direction
- Solar radiation
- Soil moisture

Real-time weather can be accessed by visiting <http://98.191.112.244/index.html>. The website provides real-time visibility to the Luke AFB Weather Squadron, 25th Operational Weather Squadron, Maricopa County Flood Control Department, National Oceanic and Atmospheric Administration, and regional law enforcement agencies. Access to real-time weather data informs time-sensitive resource management issues including (Black 2015)

- locations and servicing of emergency feed and water stations for endangered species;
- timing and control measures for invasive plants; and

- identifying areas where cultural resources may have been subject to extreme erosion events.

The BMGR West has five manual-download weather stations and is exploring options to install communication sensors on the weather stations to also report climate data in real-time. In addition, several agencies have partnered with the BMGR to gain insight into the spatial and temporal distribution of precipitation on a regional scale. The study area encompasses a large portion of southwest Arizona (Figure 2.1). The following partnering agencies participate in this regional monitoring effort (Black 2015).

- BMGR East (USAF)
- BMGR West (USMC)
- Cabeza Prieta NWR (USFWS)
- Kofa NWR (USFWS)
- Organ Pipe Cactus NM (NPS)
- Sonoran Desert NM / Ajo Block (BLM)
- Yuma Proving Ground (U.S. Army)
- Flood Control District of Maricopa County

Natural resources and meteorological staff from partnering agencies aggregate monthly precipitation data using water year (Oct. 1 to Sept. 30) rather than calendar year (Jan. 1 to Dec. 31), to avoid splitting up the winter rain. Monthly precipitation values are combined with data from neighboring agencies, including the National Oceanic and Atmospheric Administration's Cooperative Observer Program stations throughout the region, the El Pinacate and Gran Desierto de Altar Biosphere Reserve in Mexico, and the University of Arizona (UA) Meteorological Network; data from two rain gages at private homes in Ajo and Why are included as well (Black 2015). Aggregated datasets contain monthly precipitation totals for 160 stations across the region. Interpolation is used to estimate precipitation at locations without gages, based on measurements from weather stations, but this can potentially exaggerate the spatial extent of precipitation events due to the highly variable nature of precipitation in the region, especially during the monsoon season. The current method also does not consider elevation, which can be influential in precipitation events.

Future plans to improve regional climate datasets include adjusting the interpolation methodology to factor in elevation and further automating the data aggregation and interpolation processes to improve accuracy. Adding new stations, especially at mountain locations, would allow for more robust datasets, better capture the spatial variability of precipitation, and improve the understanding of how elevation influences precipitation. Additionally, expanding the network to include regional data collected by researchers from the U.S. Geological Survey, NPS, and UA would provide more surfaces for comparison and improve interpolation results (Black 2015).

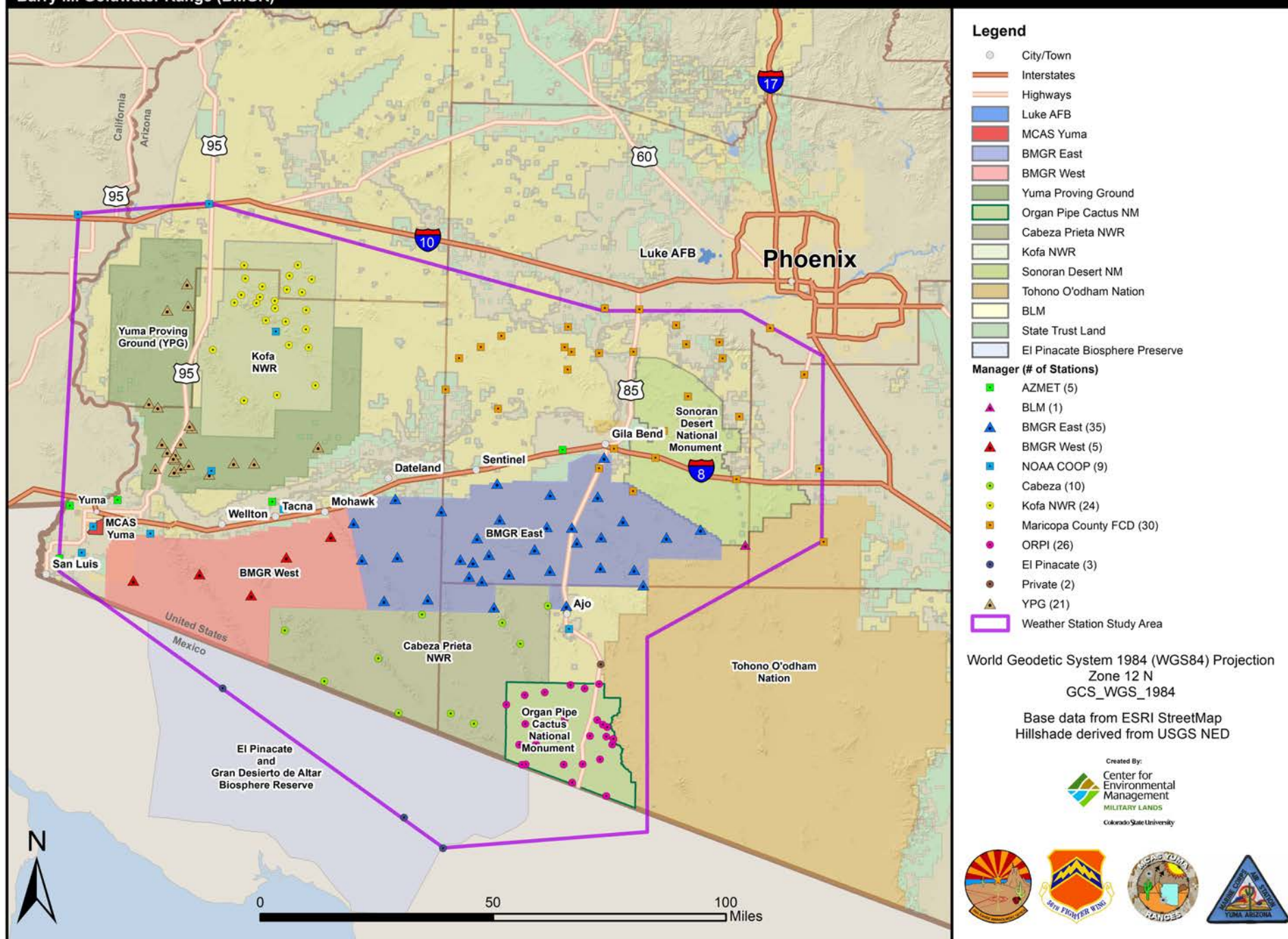
### 2.2.2 Landforms

The BMGR is located in the Basin and Range Province of Arizona, which is distinguished by broad alluvial valleys separated by steep, discontinuous mountain ranges that run northwest to southeast.

There are 15 named mountain ranges representing two physiographic types: sierras and mesas. The Mohawk Range, west of the San Cristobal Valley, is made up of rugged sierras that have characteristic towering jagged profiles. The Aguila Mountains, east of the San Cristobal Valley, are mesas that have flat tops and steep cliffs. Elevations range from 185 feet above mean sea level (AMSL) at the southwest corner of BMGR West to 4,002 feet above AMSL at the eastern edge of BMGR East atop the Sand Tank Mountains.

The westernmost valley plains are within the Gran Desierto dune system, which extends both to the west and south and into Mexico. Smaller sand dune systems have also formed in several other range locations, with the most expansive being Mohawk Sand Dunes in the central portion of the range.

### Barry M. Goldwater Range (BMGR)



Volcanic landforms are found on some parts of the range; the most notable is the Sentinel Plain Volcanic Field. A second volcanic landscape, the Crater Range, consists of eroded basalt-andesite lava flows with cliff-like escarpments and ridge-forming dikes. Isolated pillars mark the location of volcanic conduits.

### 2.2.3 Geology and Soils

The mountain ranges are formed from igneous, metamorphic, and sedimentary rock types. The alluvial valleys are deep bedrock basins filled with silt, clay, sand, and gravel deposits. These deposits can be more than 10,000 feet deep. Along many of the mountain bases, sloping masses of alluvial fill material, known as *bajadas*, extend outward like fans to taper more gradually than the mountains themselves into the generally flat valley floors.

In some parts of the range, there are extensive sheet-like formations of lava from past flows. These flows form irregular plains with rough basalt surfaces. Portions of the largest such lava flow in southern Arizona extend into the northern part of the range south of the community of Sentinel. The BMGR region is in a tectonically stable area with few earthquakes and few active faults.

#### ***BMGR East***

The BMGR East has an aridic soil moisture regime and a hyperthermic soil temperature regime. As a result, the soils are primarily Aridisols with few occurrences of Entisols, and one small area classified as Andisols (Natural Resources Conservation Service [NRCS] 2012). The soils are typically shallow and rocky with thin A horizons and varying texture. They are calcareous in nature, with high drainage capacity and limited available water holding capacity (NRCS 2012, as cited in Whitbeck 2013).

#### ***BMGR West***

In accordance with the BMGR INRMP Five-Year Action Plan 2013–2017, UA developed and implemented a digital soil mapping technique specifically for characterizing the complex alluvial and eolian deposit-dominated landscape of the BMGR West (Rasmussen and Regmi 2015). This project resulted in a range-wide, digitally assessed, high spatial resolution soil-landscape classification map depicting soil landscape variability and distribution (Rasmussen and Regmi 2015). The BMGR West staff is working with UA to complete a range-wide soil map, incorporating the newly developed soil mapping technique, within the planning period covered by the 2018 INRMP. The soil map will serve as a decision-making tool for assessing the potential for erosion and natural hazards.

### 2.2.4 Hydrology

Principal rivers in the region include the Gila and Colorado Rivers. The Gila River runs east to west just north of the BMGR boundary and connects to the Colorado River northwest of the range. Surface water on BMGR lands, however, is very limited. There are no perennial or intermittent streams present, and ephemeral stream flow occurs only in immediate response to sizeable rainfall events. Surface water drainage flows outward from the mountain ranges and, for most of the area, ultimately northward by numerous feeder washes into the larger washes that flow to the Gila River, which in turn flows west into the Colorado River.

Natural flooding events are highly variable in frequency and intensity and can have a large effect on natural community composition, structure, and function. Some storms cause flash flooding in the smaller mountain drainages and short-term flooding in the larger valley washes and floodplains. Some rainwater collects in natural rock catchments (also known as *tinajas* or tanks), human-modified natural catchments, or artificially constructed tanks where the water may persist for weeks or months without recharge until it eventually evaporates or is consumed by wildlife or people.

### **BMGR East**

The BMGR East lies within the central portion of the Sonoran Desert in the Basin and Range Lowlands hydrogeologic province. There are no perennial or intermittent streams. The presence of surface water depends on season and precipitation events within the BMGR East. Surface water drainage flows by ephemeral feeder washes outward from the mountain ranges into larger washes and into the Gila River, then eventually flowing west-southwest into the Colorado River (56 FW 2010). Perennial springs, such as Bender Springs in the Sand Tank Mountains, can be found only in the far eastern portion of the range.

Major wash systems include the San Cristobal/Growler Wash System in the San Cristobal Valley, Daniels Arroyo in the South Tactical Range (STAC), Tenmile Wash near Range 1 and North Tactical Range (NTAC), Midway Wash south of Range 2 and 4, and Saucedo and Quilotosa washes in the Sand Tanks. The San Cristobal/Growler Wash system has a very low gradient along much of its course and has created a broad, interlacing network of many small, branching and reuniting channels (56 FW 2010). This system is recognized as having some of the best remaining examples of Sonoran Desert valley bottom floodplain communities in Arizona (56 FW 2010). Daniels Arroyo is the major tributary to Growler Wash and drains northward from the Growler Mountains and Childs Mountain/Little Ajo Mountains on the Cabeza Prieta NWR and adjacent BLM lands (56 FW 2010). Tenmile Wash drains between Childs Mountain, Growler Mountains, and the Crater Range, then northwest to the Gila River (56 FW 2010). The Tenmile Wash system is wide and flat and traverses north of Range 1 and is the main drainage for NTAC (56 FW 2010). Saucedo Wash primarily drains the Saucedo Mountains and Quilotosa Wash primarily drains the Sand Tank Mountains. Both terminate at the Gila River (56 FW 2010).

Groundwater is found primarily in tertiary volcanic rocks and alluvial deposits. Recharge occurs via infiltration of rainfall runoff and underflow from adjacent alluvial basins. Groundwater quality is found to be poor and typically includes high concentrations of total dissolved solids and fluoride (56 FW 2010).

Wells registered to the USAF are located at Gila Bend AFAF, NTAC, and at Range Munitions Consolidation Point 1 (56 FW 2010). Production wells at Gila Bend AFAF and Range Munitions Consolidation Point 1 currently supply water for construction, dust control, potable water supply for selected facilities, and maintenance activities (56 FW 2010).

Flooding may occur along the major washes resulting from brief, intense summer monsoon events or longer-duration winter and spring rainfall events. Significant rainfall events over the past few years have caused considerable erosion on the ETAC, sometimes temporarily making roads impassable. In 2014, a section of the road between SR 85 and Range 1 washed away, affecting daily

travel to and from several ranges and damaging a previously recorded archaeological site (CRP, in prep.).

### **BMGR West**

BMGR West consists of three major watersheds: Yuma Desert Wash, which drains west into the Colorado River, and Coyote and Mohawk washes, which drain to the north into the Gila River (Duan et al. 2017).

In June 2015, BMGR West began to monitor erosion across the range using three field methods: (1) deployment of a three-dimensional camera, (2) ground-based light detection and ranging (also known as LIDAR), and (3) manually measuring erosion using an electronic, survey-grade theodolite total station (Duan et al. 2017). Monitoring erosion will help the BMGR West resource managers prioritize erosion-prone areas and identify whether wind or rainfall runoff erosion is dominant (Duan et al. 2017). The results have implications in developing restoration strategies for selected sub-basins across the range (Duan et al. 2017).

## **2.3 Ecosystems and the Biotic Environment**

Ecoregions delineate areas of general similarity in ecosystem type and the type, quality, and quantity of environmental resources. Ecoregions are identified through the spatial patterns and composition of biotic and abiotic phenomena, including geology, physiography, vegetation, climate, soils, land use, wildlife, and hydrology. A Roman numeral hierarchical scheme has been adopted for classifying different levels of ecological regions, with Level I being the coarsest and Level IV the most detailed. The BMGR lies within the Level III Sonoran Basin and Range Ecoregion, which encompasses several Level IV ecoregions (Griffith et al. 2014). They are designed to serve as a spatial framework for the research, assessment, management, and monitoring of ecosystem components. Ecoregions are critical for structuring and implementing ecosystem management strategies across various agencies and organizations.

The range has maintained its ecological integrity over the past 80 years, largely because its mission predominantly utilizes the airspace above the range. Furthermore, the restrictions placed on land use exclude grazing and mineral extraction, and they limit both development and public access to some degree (Rosenberg 2015).

### **2.3.1 Vegetation**

Nearly 290 species of Sonoran Desert plants characteristic of the Arizona Upland and of the Lower Colorado River Valley are reported to occur at BMGR. Vegetation of the Arizona Upland is restricted principally to portions of the range east of SR 85, where the slopes and upper *bajadas* of the Sand Tank and Saucedo Mountains influence the soils and precipitation regimes that shape the plant communities. Vegetation within the remaining portion of the range is characteristic of the Lower Colorado River Valley plant communities. The distribution of plant communities in both of these areas is influenced by the diverse landscape of the range, in which the series of widely spaced rugged mountain ranges, broad valley plains, sand dune systems, surface water drainages, and *playas* are the most important features.

### 2.3.1.1 Historical Vegetative Cover

Agriculture grazing, and mineral extraction have extensively modified the Sonoran Desert vegetation (NPS 2016). Over 3,000 years ago, early agricultural practitioners constructed massive systems of irrigation canals along major river valleys, and crop seeds were sown near washes to capture runoff during rainy seasons (NPS 2016). When the Europeans arrived, they introduced Eurasian plants, animals, and microbes that transformed the landscape in “an ecological revolution. . .” (NPS 2016). Mining and livestock grazing were the two largest land uses, which by the mid-19th century had caused substantial degradation in the central and southern Sonoran Desert, with numerous accounts of overgrazing and subsequent abandonment (NPS 2016). In 1937, a coarse-scale vegetation map was developed for Arizona (Figure 2.2) (Nichol 1937). Nichol classified the mountains as “Palo Verde-Cacti, and Burr Sage” and the valleys as “Creosote Bush + Salt Brush” (Nichol 1937).

### 2.3.1.2 Current Vegetative Cover

As a part of the 2007 INRMP planning process, The Nature Conservancy reviewed the ecological structure, composition, and processes of the current vegetation cover and identified 13 natural communities. Nine of these 13 natural communities and their estimated sizes, based on the best available geographic information system (GIS) information, are as follows.

- Valley Bottom Floodplain Complex—29,000 acres
- Dune Complex and Dune Endemics—30,000 acres
- Creosote Bush (*Larrea tridentata*) - Bursage (*Ambrosia* spp.) Desert Scrub —1,360,000 acres
- Creosote Bush - Big Galleta (*Hilaria rigida*) Scrub—24,000 acres
- Paloverde (*Parkinsonia* spp.) - Mixed Cacti - Mixed Scrub on *Bajadas* —191,000 acres
- Paloverde - Mixed Cacti - Mixed Scrub on Rocky Slopes —63,000 acres
- Sand Tank Mountains Uplands—10,000 acres
- Elephant Tree (*Bursera microphylla*) - Limberbush (*Jatropha cinerea*) on Xeric Rocky Slopes—91,000 acres
- Desert *Playa*—170 acres

Areas occupied by the Salt Desert Scrub community and by the Desert *Tinajas*/Springs community are small and were not estimated as part of the 2007 assessment. Two xeroriparian communities are associated with washes. The extent of these communities is best described in linear units:

- Valley Xeroriparian Scrub—2,325 linear miles
- Mountain Xeroriparian Scrub—400 linear miles

These natural communities are described in terms of their ecological characteristics (composition, structure, function/ecological process, physiographic occurrence, and associated soil characteristics) in Table 2.3 and their locations are illustrated in Figure 2.3. The xeroriparian communities align with the washes shown in Figure 2.3. (The isolated point data for Salt Desert scrub communities east of the Copper Mountains and east of the Mohawk Mountains are not illustrated.)



Table 2.3: Ecological characteristics of the BMGR natural vegetation communities, as assessed by The Nature Conservancy.

Natural Community Element	Composition	Structure	Function/ Ecological Process	Physiographic Occurrence	Associated Soil Characteristics
Valley Bottom Floodplain Complex	Characteristic vegetation includes creosote bush, triangle-leaf bursage ( <i>A. deltoidea</i> ), white bursage ( <i>A. dumosa</i> ), acacias ( <i>Acacia</i> spp.), paloverdes, mesquites ( <i>Prosopis</i> spp.), and annual and perennial grasses.	Community occurs as patchy, shifting mosaics of sparse vegetation in relatively dry areas interspersed with dense vegetation within shallow depressions where water accumulates. Linear occurrences of vegetation characteristic of the Valley Xeroriparian Scrub community may be present within this complex.	Forms on nearly flat terrain (valley bottoms) where sheet flow may be an important hydrological phenomenon. Vegetation provides forage, cover, nesting sites, and perches for wildlife.	Vegetation is located at the base of pediments and extends onto valley floors. Examples are found in the Growler and San Cristobal Valleys.	Generally forms on deep loams and sandy loams that are often prone to accelerated erosion.
Dune Complex and Dune Endemics	Complex is generally sparsely vegetated by scattered forbs and grasses. May include shrubs and dwarf shrubs such as white bursage. Stabilized dunes may support creosote bush and mesquites while active dune fields may lack vegetation.	Community occurs as patchy shifting mosaic within Creosote Bush – Bursage Desert Scrub. Includes active open dunes, stabilized dunes, and stabilized flat, sand sheets. This complex has a sparse and seasonally variable herbaceous layer with a sparse cover of shrubs that are less than seven feet tall.	Contains a high number of endemic species that have adapted to moving sand. Water may be held for long periods just under the surface by sand.	Active, stabilized, and partially stabilized dunes found in valleys. Dune complexes are found west of the Mohawk Mountains, in the Gran Desierto southeast of Yuma, in San Cristobal Valley, and in the northern Growler Valley.	Area consists of sand dune complexes.
Creosote Bush – Bursage Desert Scrub	Vegetation is primarily dominated by creosote bush. Woody and non-woody cacti and rosette succulents commonly occur on rocky slopes. Seasonally present perennial grasses with some perennial forbs dominate the sparse herbaceous layer.	Includes extensive networks of Valley Xeroriparian Scrub communities with large patches of active and stabilized dune complexes. Vegetation typically includes sparse to moderately dense layers of microphyllous and broad-leaved evergreen subshrubs and shrubs less than 7 feet tall.	Linear xeroriparian systems and large patch dune fields nested within the creosote bush-bursage-matrix dominate.	This community is found on lower <i>bajadas</i> and intermountain basins that are generally flat or on gentle to moderate slopes. Vegetation on the lower <i>bajadas</i> and valley west of the Saucedo Mountains is a good example of this community.	Substrate is usually sandy or gravelly alluvium derived from limestone and metamorphic rocks. Soils are typically of low salinity.
Creosote Bush – Big Galleta Scrub	Dominant shrub is Creosote bush. Big galleta is the sole or dominant grass in the herbaceous layer. White or triangle-leaf bursage can be a co-dominant.	Scattered shrubs and dense grasses typically form the first two layers of vertical structure of this complex. A tree canopy provides a third layer when mesquite is present.	Located on highly erodable sands around downcutting desert washes. Also sometimes found on hillsides where sand has accumulated downwind and vegetation has been dispersed by birds.	This community may be found growing on flat ridges, low gradient slopes and among stabilized sand dunes in portions of the Mojave and Sonoran deserts. The only mapped occurrence of the community is located in the Sentinel Plain area.	Soils generally consist of sandy loam. These soils are well-drained.
Paloverde – Mixed Cacti – Mixed Scrub on Bajadas	Vegetation has a conspicuous but relatively sparse layer of saguaro cactus ( <i>Carnegiea gigantea</i> ). A sparse to moderately dense short tree / tall shrub canopy is also present and consists of paloverde and creosote bush and, less prominently, ironwood and ocotillo ( <i>Fouquieria splendens</i> ). A sparse herbaceous layer dominated by perennial grasses and forbs with some annuals is present.	The dominant vegetation occurs in sparse to moderately dense woody layers of short shrubs, tall shrubs, and short trees, ranging from 1.5 to 16 feet tall. The herbaceous layer is generally sparse with scattered perennial grasses and forbs. The uppermost layer consists of a layer of large, columnar cacti.	Linear xeroriparian systems are nested within the matrix of this community. Climate extremes may cause die-back of many plant species.	This community typically surrounds rocky slopes of low mountain ranges. The best example of this community occurs on the lower slopes and <i>bajadas</i> of the Sand Tank Mountains.	Soil generally consists of gravelly alluvium derived from basalt. Soil substrates are generally coarse-textured, shallow, gravelly clay loams. Caliche is a common characteristic.

Table 2.3: Ecological characteristics of the BMGR natural vegetation communities, as assessed by The Nature Conservancy.

Natural Community Element	Composition	Structure	Function/ Ecological Process	Physiographic Occurrence	Associated Soil Characteristics
Paloverde – Mixed Cacti – Mixed Scrub on Rocky Slopes	This community is of similar composition to that of the Paloverde – Mixed Cacti – Mixed Scrub on <i>Bajadas</i> but contains additional associates such as teddy bear cholla ( <i>Cylindropuntia bigelovii</i> ).	This community is found along narrow drainages throughout large patches of sparse to clumped vegetative canopies. It generally occurs on highly irregular bedrock outcrops.	Linear xeroriparian systems are nested within the matrix of this community. Climate extremes may cause die-back of many plant species.	This community is found throughout low mountain ranges, primarily above the major pediments. The best example occurs in the Saucedo Mountains.	This community occurs on highly irregular bedrock outcrops. Soils are generally of the Lithic Camborthids-Rock Outcrop-Lithic Haplargids Association, which are typically composed of very cobbly to cobbly loams, very stony to stony loams, gravelly very fine sandy loams, and rock outcrops. Soils of these mountains are subject to slight water erosion.
Sand Tank Mountains Uplands	Vegetation in this complex includes saguaro cactus and a sparse to moderately dense canopy of short trees / tall shrubs consisting of paloverde and creosote bush. Typical associates include crucifixion thorn ( <i>Koeberlinia spinosa</i> ) and Sonora rosewood ( <i>Vauquelinia californica sonorensis</i> ). Also present is a sparse herbaceous layer dominated by perennial grasses and forbs.	Large patches of a sparse to clumped vegetative canopy are found on steep, highly irregular bedrock outcrops. The structure is variable and influenced by aspect, edaphic characteristics, and sheltering cliffs and rocks.	Dynamic processes on landscapes dominated by this community are driven by linear xeroriparian systems that are nested within the larger community. Climate extremes may result in the periodic die-back of many plant species.	This community occurs at high elevations in and around the Sand Tank Mountains.	The community occurs on steep, rocky slopes. Soils of these mountains are subject to slight water erosion. They are comprised principally of the Lithic Camborthids-Rock Outcrop-Lithic Haplargids Association, which are generally very cobbly to cobbly loams, very stony to stony loams, gravelly very fine sandy loams, and rock outcrops.
Elephant Tree – Limberbush on Xeric Rocky Slopes	The composition of this community is similar to that of the Paloverde – Mixed Cacti – Mixed Scrub system, but is characterized by additional associates. Elephant tree, limberbush, Bigelow’s nolina ( <i>Nolina bigelovii</i> ), and Kearney’s sumac ( <i>Rhus kearenyi</i> ) are dominant in a mixed canopy. Vegetation of this system may differ with substrate.	This community forms large patches with a sparse to clumped vegetative canopy on highly irregular bedrock outcrops.	Linear xeroriparian systems are nested within the matrix of this community. Climate extremes may result in the periodic die-back of many plant species.	This community is found throughout low mountain ranges in the most arid portions of the Lower Colorado Valley and Arizona uplands of the Sonoran Desert. Mountain Xeroriparian Scrub is found throughout this large-patch community along narrow drainages. Examples of this community occur in the Tinajas Altas and Gila Mountains.	The community is commonly associated with granite bedrock and granite-derived gravels at the base of the mountains.
Desert Playa	Generally, desert <i>playas</i> in the central Sonoran Desert are sparsely vegetated, with periodic emergence of ephemeral species. Large <i>playas</i> in the Sonoran Desert may have surrounding rings of vegetation. Characteristic vegetation differs between <i>playas</i> and unpredictable annuals may emerge.	Large patches are formed on flat plains and basins. Deep ravines may be formed as a result of drainage into the <i>playas</i> but are subsequently filled in. Desert <i>playas</i> are often located within a matrix of Creosote Bush/Bursage Desert Scrub and may be associated with active and stabilized sand dunes.	Dominant ecological processes of desert <i>playas</i> are periodic flooding and subsequent evaporation. Large mud cracks at <i>Las Playas</i> may be related to volcanic activity.	Large open expanses that support <i>playa</i> lakes may also serve as sand sources for dunes located down-wind. Rainfall absorbed into dune fields may serve as a water source for seepage into the <i>playa</i> lakes. Many <i>playas</i> include dissected streambeds that are erased through time. Mohawk Playa is the best example at BMGR.	<i>Playas</i> are typically associated with active and stabilized sand dunes.
Desert Tinaja / Spring	<i>Tinajas</i> are typically small aquatic ecosystems formed through water accumulation in bedrock depressions. Vegetation is typically absent or present as a few individual plants.	The community generally appears in the form of small patches among bedrock exposures.	The periodic inflow and slow evaporation are the primary processes that support <i>tinajas</i> . <i>Tinajas</i> may retain water permanently.	This community may occur in bedrock depressions throughout the Desert Southwest. Examples include <i>Tinajas</i> Altas and Bender Springs.	The community is commonly associated with bedrock depressions.

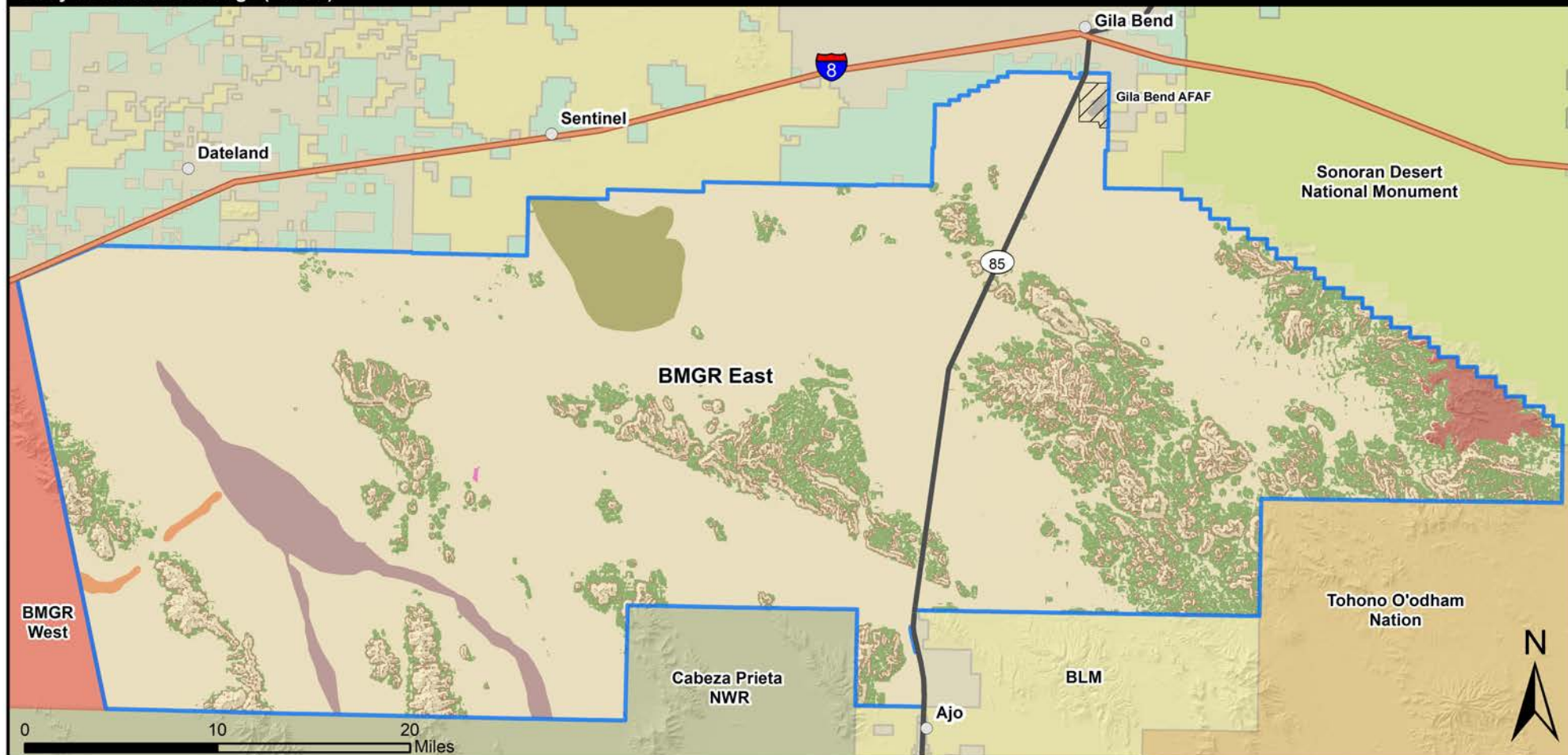
Table 2.3: Ecological characteristics of the BMGR natural vegetation communities, as assessed by The Nature Conservancy.

Natural Community Element	Composition	Structure	Function/ Ecological Process	Physiographic Occurrence	Associated Soil Characteristics
Salt Desert Scrub	Two main types of saltbush communities occur. Saltbush communities found along major riverine systems typically have been converted to agriculture. The drier upland type is associated with creosote bush and numerous cactus species. The community is dominated by the xeromorphic shrub, cattle saltbush ( <i>Atriplex polycarpa</i> ). The sparse to moderately dense graminoid layer may be dominated by warm-season, medium-tall and short grasses. Forb cover is generally sparse.	This community may form large patches on desert <i>bajadas</i> . Vegetation typically has a sparse to moderately dense layer of shrubs up to 7 feet in height.	The dominant xeromorphic shrub, <i>Atriplex polycarpa</i> , tolerates saline or alkaline soils and marks the extent of deep, fine loams of significant agricultural value.  Periodic flooding, while infrequent, is tolerated by this community.	This community occurs on both upland and lowland sites throughout much of the arid and semi-arid western U.S.  Lowland sites include alluvial flats, drainage terraces, <i>playas</i> , washes, and interdunal basins, whereas upland sites include bluffs and gentle to moderately steep sandy or rocky slopes. An example of this community occurs within the San Cristobal Valley.	Soils are variable, with depths ranging from shallow to moderately deep and textures ranging from sands to loams to clay.  Lowland sites may be moderately saline or alkaline.
Valley Xeroriparian Scrub	Characteristic vegetation is highly variable and includes blue and foothill paloverdes ( <i>P. florida</i> and <i>P. microphylla</i> , respectively), ironwood ( <i>Olneya tesota</i> ), mesquite, herbaceous and woody perennial vines, and sparse annual grasses and forbs.	Found in narrow linear strips in downcut channels with a moderate to dense layer of trees and shrubs that are generally less than 16 feet tall. Herbaceous layer typically is sparse.	Channel-constricted flow is the dominant ecological process. Frequency and amount of runoff, shading, and channel scouring influence xeroriparian vegetation gradients.	Found on mountain slopes with a grade of less than 6 percent and extend onto valley bottoms. This community is predominant in the more arid areas west of SR 85. Daniels Arroyo is a good example.	Generally located on course-textured substrates, but also occurs on gravelly silty loams.
Mountain Xeroriparian Scrub	Characteristic vegetation is highly variable but typically consists of paloverdes, ironwood, mesquites, and succulents.	Found in narrow linear strips in downcut channels with a moderate to dense layer of trees and shrubs that are generally less than 16 feet tall. Herbaceous layer typically is sparse.	Channel-constricted flow is the dominant ecological process.	This community is found on upper <i>bajadas</i> and low- to moderate-elevation mountain slopes with more than a 6 percent grade.	May be on exposed bedrock on upper mountain slopes. Soils are generally not saline.

Figure 2.3: BMGR East Natural Communities as Assessed by TNC

2018-2023 Integrated Natural Resource Management Plan (INRMP)

Barry M. Goldwater Range (BMGR)



## Legend

- |                  |                                 |  |  |
|------------------|---------------------------------|--|--|
| ○ City/Town      | ■ Cabeza Prieta NWR             | ■ Creosote Bush - Big Galleta Scrub        | ■ Paloverde-Mixed Cacti-Mixed Scrub on Rocky Slopes      |
| — Interstates    | ■ Sonoran Desert NM             | ■ Creosote Bush-White Bursage Desert Scrub | ■ Sand Tank Mountains Palo Verde-Mixed Cacti-Mixed Scrub |
| — Highways       | ■ Tohono O'odham Nation         | ■ Desert Playa                             | ■ Valley Bottom Floodplain Complex                       |
| □ BMGR East      | ■ BLM                           | ■ Dune Complex and Dune Endemic            |  |
| ■ BMGR West      | ■ State Trust Land              | ■ Paloverde-Mixed Cacti Scrub on Bajadas   |  |
| ▨ Gila Bend AFAP | <b>BMGR Natural Communities</b> |  |  |
|                  | ■ Developed                     |  |  |

World Geodetic System  
1984 (WGS84) Projection  
Zone 12N  
GCS\_WGS\_1984

Base data from ESRI StreetMap  
Hillshade derived from USGS NED

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### ***Southwest Arizona Seamless Mapping Effort***

In 1981, the NPS developed a vegetation map for the Organ Pipe Cactus NM following the protocol developed by P.L. Warren and others from the UA (Malusa and Sundt 2015). Since this time, an effort has been underway to map all connecting federal land management entities following the same standardized protocol through the support of the Desert Southwest Cooperative Ecosystem Studies Unit and UA. Completed mapping units include the BMGR West, Organ Pipe Cactus NM, Cabeza Prieta NWR and BLM lands in the Ajo Block, and portions of the BMGR East (Malusa 2003; McLaughlin et al. 2007; Osmer et al. 2009; Malusa 2010; Shepherd 2011; Whitbeck 2013; Malusa and Sundt 2015; Weston and Fehmi 2016). Approximately 100,000 acres of the BMGR East remains to be mapped. When the remaining portions of the BMGR East are completed in FY 2019, one cohesive map will be produced for all mapped federal lands within southwestern Arizona using a common methodology and common mapping units. This seamless map will provide a baseline for ecosystem management decisions and be a useful tool for land and resource managers to better understand how wildlife species are utilizing the landscape and associated vegetation.

The maps classify vegetation communities following the U.S. National Vegetation Classification System (USNVC). The hierarchical framework of the USNVC documents community alliances and associations. Alliance is the broadest level of classification used for vegetation mapping and is defined by a characteristic range of species composition, habitat conditions, physiognomy, and diagnostic species, typically where at least one is found in the uppermost or dominant stratum of the vegetation layer (USNVC 2017). Alliances reflect regional climate, hydrologic, substrate, and disturbance regimes and trends (USNVC 2017). Communities are typically mapped at a finer-scale-association level that is based on the characteristic range of species composition, diagnostic species occurrence, habitat conditions, physiognomy, and local climatic, hydrologic, and disturbance regimes and trends (USNVC 2017). Occasionally, vegetation communities are mapped down to the subassociation level, whereas an association typically occurs with a particular landform, such as with White Bursage-Big Galleta Grass on Dunes (Malusa and Sundt 2015).

### ***BMGR East***

Detailed mapping was conducted by the UA in five phases (Table 2.4, Figure 2.4). The first phase began in 2003 with the mapping of the NTAC and STAC (McLaughlin et al. 2007). Next the ETAC Range and Area B were mapped, then the western San Cristobal Valley, and then the eastern San Cristobal Valley, Aguila Mountains, and Sentinel Plain (Osmer et al. 2009; Shepherd 2011; Whitbeck 2013; Weston and Fehmi 2016). To complete the remaining portions of the comprehensive vegetation-association mapping effort, the following areas are scheduled to be mapped over the course of FY 2018 and FY 2019.

- Approximately 11,000 acres along the “stair-step” boundary between the easternmost portion of the range and the Sonoran Desert NM.
- Approximately 90,000 acres identified as having a slope greater than 20 percent were deemed less suitable for Sonoran pronghorn and were not mapped to reduce costs. As of February 2018, the remaining areas to be mapped are accounted for within the Brittlebush (*Encelia farinose*) – Creosote – White Bursage / Yellow Paloverde association.

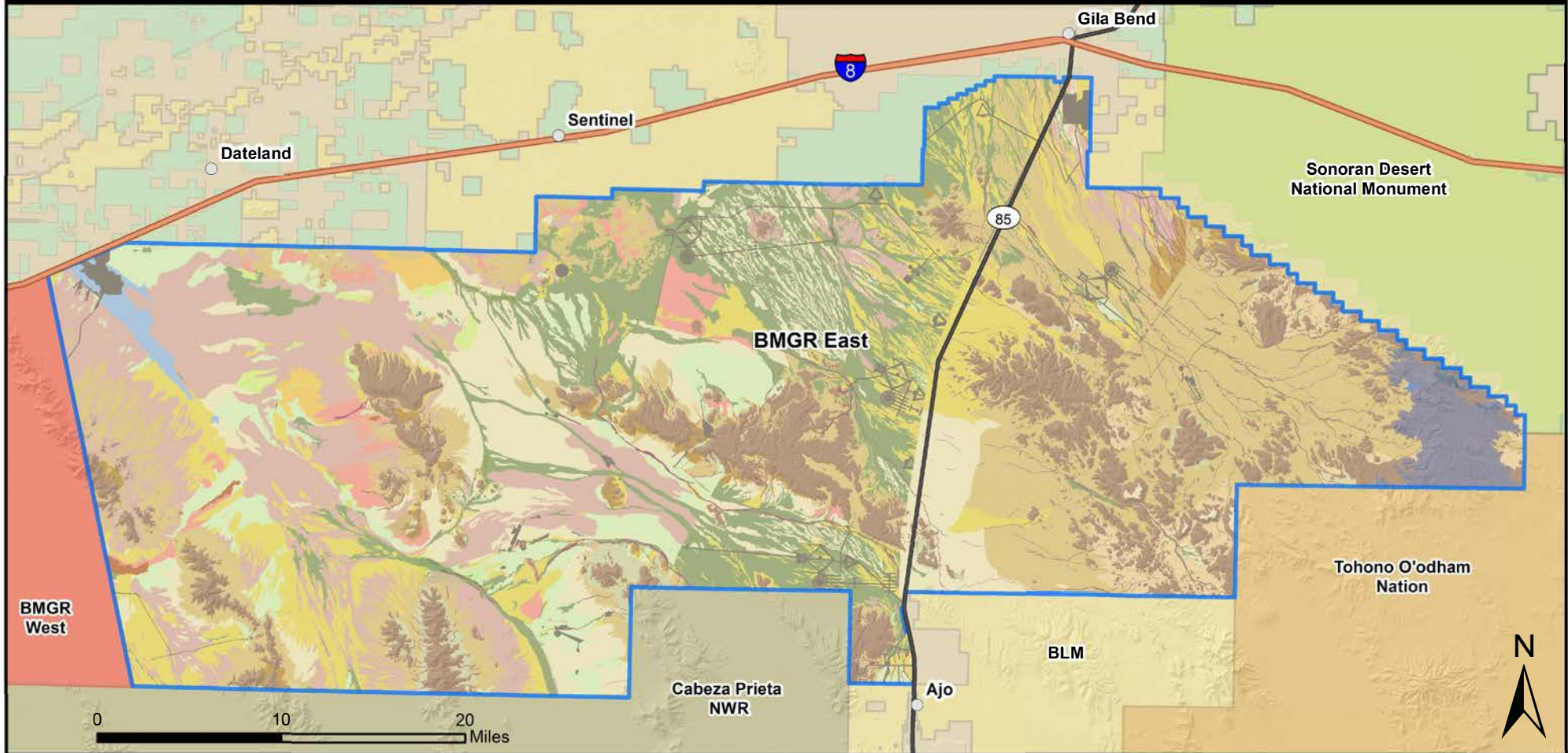
Table 2.4: BMGR East vegetation associations.

<b>Vegetation Association<sup>1</sup></b>	<b>Total Acres</b>
Creosote / Paloverde – Ironwood	221,645
Creosote / Triangle Leaf Bursage	148,356
Creosote Floodplain	135,891
Creosote – White Bursage – Triangle Leaf Bursage	114,980
Creosote Monotype	110,577
Brittlebush ( <i>Encelia farinose</i> ) – Creosote – White Bursage / Yellow Paloverde (90,000 acres unsurveyed)	135,513
Creosote – White Bursage	55,264
>20 percent Slopes or Mountains	29,943
Bursage / Creosote – Wolfberry ( <i>Lycium</i> spp.) / Paloverde	23,529
Mountain Uplands	20,522
Creosote – White Bursage – Big Galleta Grass	19,459
Disturbed	14,647
White Bursage – Creosote – Teddy Bear Cholla ( <i>Cylindropuntia bigelovii</i> )	11,846
Creosote – Teddy Bear Cholla	9,905
Wolfberry	8,074
Creosote – Fagonia ( <i>Fagonia</i> spp.) – White Bursage	5,715
Saltbush ( <i>Atriplex</i> spp.) – Slender Saltbush ( <i>A. tenuissima</i> ) – Creosote	5,393
Creosote / Desert Saltbush ( <i>A. polycarpa</i> ) / Mesquite	4,165
Bursage spp. / Creosote / Yellow Paloverde / Ironwood	2,318
White Bursage / Big Galleta Grass / Creosote	1,199
White Bursage – Creosote	943
Jojoba ( <i>Simmondsia chinensis</i> ) / Lycium Mountains	872
Mesquite – Paloverde	817
Honey Mesquite ( <i>P. glandulosa</i> ) Playa	88
Brittlebush Terrace	71
Barren	51

<sup>1</sup> Forward slashes ( / ) separate different strata; the en-dashes ( – ) separate species within a stratum

**Figure 2.4: BMGR East Vegetation Community**

Barry M. Goldwater Range (BMGR)

**2018-2023 Integrated Natural Resource Management Plan (INRMP)****Legend**

- City/Town
  - Interstate 8
  - State Route 85
  - BMGR East
  - BMGR West
  - Cabeza Prieta NWR
  - Sonoran Desert NM
  - Tohono O'odham Nation
  - BLM
  - State Trust Land
- BMGR East Vegetation Associations**
- 0 - Barren
  - 10 - Creosote Monotype
  - 11 - Creosote - White Bursage
  - 12 - Creosote - Triangle Leaf Bursage
  - 13 - Creosote - White Bursage - Triangle Leaf Bursage
  - 14 - Creosote - Teddy Bear Cholla
  - 15 - Creosote Floodplain
  - 16 - Creosote - White Bursage - Big Galleta Grass
  - 17 - Creosote / Palo Verde - Ironwood
  - 18 - Creosote / Desert Saltbush / Mesquite

- 19 - Creosote - Fagonia - White Bursage
- 21 - Bursage / Creosote - Wolfberry / Palo Verde
- 24 - White Bursage - Creosote - Teddy Bear Cholla
- 25 - Bursage spp. / Creosote / Yellow Palo Verde / Ironwood
- 26 - White Bursage / Big Galleta Grass / Creosote
- 28 - White Bursage - Creosote
- 30 - Jojoba / Lycium Mountains
- 31 - Mountain Uplands
- 50 - Disturbed
- 60 - Brittlebush Terrace
- 63 - Brittlebush - Creosote - White Bursage / Yellow Palo Verde
- 70 - Saltbush - Slender Saltbush - Creosote
- 80 - Mesquite - Palo Verde
- 81 - Wolfberry
- 82 - Honey Mesquite Playa

World Geodetic System  
1984 (WGS84) Projection  
Zone 12N  
GCS\_WGS\_1984

Base data from ESRI StreetMap  
Hillshade derived from USGS NED

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**BMGR West**

Vegetation mapping efforts began in 2009 and were completed in 2014 (Malusa 2010; Malusa 2012; Malusa and Sundt 2015; Figure 2.5). The majority of the BMGR West is part of Mojave-Sonoran Semi-Desert Scrub Macrogroup, which covers most of the Mojave and Sonoran deserts in the Southwestern U.S. Within this macrogroup, there are six alliances, including creosote, bursage, saltbush, brittlebush, watercourse, and blue paloverde. Within these alliances are 23 associations, such as Creosote-Teddy Bear Cholla. Finally, within these associations are 40 subassociations, the most detailed mapping unit.

The remainder of the BMGR West falls under the Great Basin & Intermountain Dry Shrubland & Grassland Macrogroup. This vegetation is characterized by shrubs like Mormon tea (*Ephedra viridis*) and is restricted to the north slopes of the higher mountains. On the BMGR West, this macrogroup comprises one alliance, two associations, and two subassociations (Malusa and Sundt 2015). Figure 2.5 depicts the BMGR West vegetation communities mapped at the association level. The 2015 report, *Vegetation Mapping of the Barry M. Goldwater Range West, Marine Corps Air Station-Yuma, Arizona* (Malusa and Sundt 2015), provides a detailed description of the mapped vegetation subassociations. Table 2.5 lists and quantifies the broadly categorized vegetation associations (Malusa and Sundt 2015).

**2.3.2 Turf and Landscaped Areas**

This section of the INRMP applies to installations that are developed. The BMGR is an undeveloped desert and none of the lands are landscaped or have turf. Gila Bend AFAF, on BMGR East, has several small turf areas and several rows of planted trees. Gila Bend AFAF is operated and maintained by a USAF Contractor and all turf and landscape areas are maintained by the contractor or sub-contractor as part of the service contract agreement. The total area of Gila Bend AFAF is approximately 385 acres with less than 7 acres containing turf or landscaped areas.

**2.3.3 Fish and Wildlife**

Wildlife found at the BMGR is typical of that found in the Sonoran Desert ecosystem. Available inventories show that over 200 species of birds, over 60 mammal species, and 10 amphibian species occur or may potentially occur within the BMGR and the adjacent Cabeza Prieta NWR. Due to the absence of permanent water sources, the occurrence of amphibians is limited and there are no fish. Evidence indicates that the diversity and population sizes of wildlife species and the amount of habitat have remained relatively stable and typical for this portion of the Sonoran Desert. This is attributed to that fact that land withdrawn for military use excludes or limits other land uses such as livestock grazing, farming, mining, and off-road vehicle recreation. Due to BMGR's large size and interconnectedness with two NMs and one NWR, as well as its distance from metropolitan areas and anthropogenic impacts, the installation remains one of the last remaining large swaths of pristine Sonoran Desert.

Table 2.5: BMGR West vegetation associations.

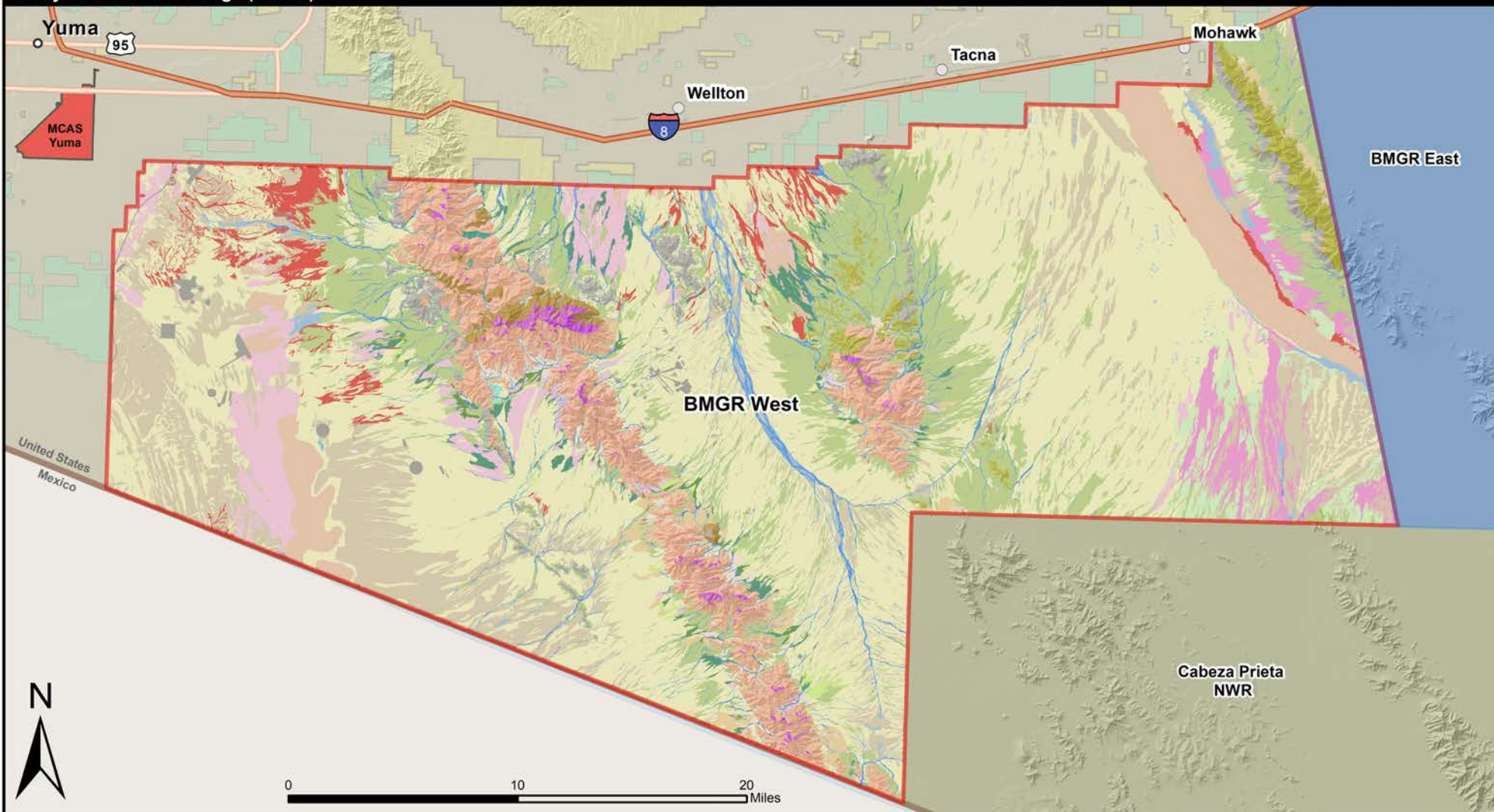
Vegetation Association <sup>1</sup>	Total Acres
Creosote – White Bursage	275,715
Creosote – Bursage / Paloverde – Ironwood	97,543
Creosote Monotype	96,401
White Bursage – Elephant Tree	49,096
White Bursage – Big Galleta Brass	28,040
White Bursage – Creosote	26,403
Wolfberry	15,082
Creosote – Triangle Leaf Bursage	14,252
Creosote – White Bursage – Big Galleta Grass	13,639
Creosote – Fagonia – White Bursage	11,984
Creosote – White Bursage – Triangle Leaf Bursage	10,629
Brittlebush – Creosote – White Bursage / Yellow Paloverde	10,073
Creosote – Teddy Bear Cholla	9,867
Creosote Floodplain	6,256
White Bursage – Creosote / Paloverde / Ironwood	5,687
Disturbed	4,155
Brittlebush – Creosote	4,075
White Bursage – Creosote – Teddy Bear Cholla	3,949
Mormon Tea – Agave ( <i>Agave</i> spp.) / White Bursage	2,864
Brittlebush – Ironwood – Blue Paloverde	2,600
Arrowleaf ( <i>Pleurocoronis pluriseta</i> ) / Sumac ( <i>Rhus</i> spp.) / Beargrass ( <i>Nolina microcarpa</i> ) / Mormon Tea	1,937
Brittlebush – White Bursage – Creosote	1,934
Barren	911
Lavender ( <i>Hyptis emoryi</i> ) – Holly Leaf Bursage ( <i>A. ilicifolia</i> )	444
Blue Paloverde / Holly Leaf Bursage	263
Desert Holly ( <i>A. hymenelytra</i> ) – White Bursage	147
Mesquite – Paloverde Bosque	19

<sup>1</sup> Forward slashes ( / ) separate different strata; the en-dashes ( – ) separate species within a stratum.

Figure 2.5: BMGR West Vegetation Community Map

2018-2023 Integrated Natural Resource Management Plan (INRMP)

Barry M. Goldwater Range (BMGR)



## Legend

- Interstate 8
- Highways
- City/Town
- BMGR East
- BMGR West
- MCAS Yuma
- Cabeza Prieta NWR
- BLM
- State Trust Land

## BMGR West Vegetation Associations

- 0 - Barren
- 10 - Creosote Monotype
- 11 - Creosote-White Bursage
- 12 - Creosote-Triangle Leaf Bursage
- 13 - Creosote-White Bursage-Triangle Leaf Bursage
- 14 - Creosote-Teddy Bear Cholla
- 15 - Creosote floodplain
- 16 - Creosote-White Bursage-Big Galleta Grass

- 17 - Creosote-Bursage/Palo Verde-Ironwood
- 19 - Creosote-Fagonia-White Bursage
- 24 - White Bursage-Creosote-Teddy Bear Cholla
- 26 - White Bursage-Big Galleta Grass
- 27 - White Bursage-Elephant Tree
- 28 - White Bursage-Creosote
- 29 - White Bursage-Creosote/Palo Verde/Ironwood
- 40 - Mormon Tea-Agave/White Bursage

- 41 - Arrowleaf/Sumac/Beargrass/Mormon Tea
- 50 - Disturbed
- 63 - Brittlebush-Creosote-White Bursage/Yellow Palo Verde
- 67 - Brittlebush-Creosote
- 68 - Brittlebush-White Bursage-Creosote
- 69 - Brittlebush-Ironwood-Blue Palo verde
- 71 - Desert Holly-White Bursage
- 80 - Mesquite-Palo Verde

- 81 - Wolfberry
- 83 - Lavender-Hollyleaf Bursage
- 90 - Blue Palo verde/Hollyleaf Bursage

World Geodetic System  
1984 (WGS84) Projection  
Zone 11N  
GCS\_WGS\_1984

Base data from ESRI StreetMap  
Hillshade derived from USGS NED

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Figure 2.6: AGFD conducts surveys for many species at BMGR, including flat-tailed horned lizard (left), Le Conte's thrasher (middle), and bighorn sheep (right).

Threats to wildlife populations and habitat include an increase in the number of trespass livestock. Vulnerabilities to wildfires (see Section 7.9) created by the expansion of invasive species and persistent, reoccurring droughts may be related to climate change. Threats to habitat and wildlife from illegal cross-border traffic have sharply diminished with the completion of the border barrier fence. Restrictions to military use or public recreation activities to protect or rehabilitate habitat have not been established.

#### 2.3.4 Threatened and Endangered Species and Species of Greatest Conservation Need

There are currently two species listed under the ESA known to occur at BMGR: Sonoran pronghorn (*Antilocapra americana sonoriensis*) and acuña cactus (*Echinomastus erectocentrus* var. *acunensis*). For its continued survival, the pronghorn (see Section 7.4.1) depends on the Sonoran Desert ecosystem of the BMGR, Cabeza Prieta NWR, and Organ Pipe Cactus NM. The acuña cactus was federally listed as endangered in 2013 and is found mainly at BMGR East, Tohono O'odham Nation Reservations, BLM lands, Organ Pipe Cactus NM, and areas southeast of Phoenix (between Cactus Forest and Kearny). The lesser long-nosed bat, previously federally listed as endangered, was delisted in April 2018 (USFWS 2018).

The flat-tailed horned lizard (FTHL) (*Phrynosoma mcallii*) has no federal protection in the U.S., but it is listed as threatened in Mexico and is a Species of Greatest Conservation Need (SGCN) in Arizona and a species of concern in California. The FTHL occurs at BMGR West and is managed in accordance with the Candidate Conservation Agreement and the FTHL Rangewide Management Strategy (RMS), to which the USMC and AGFD are parties. The FTHL (see Section 7.4.4) occurs at the far western portion of the BMGR West and has been the subject of considerable ESA and federal court activities. Much of the FTHL's historical habitat (possibly as much as 50 percent) in the U.S. has been lost due to agricultural and residential development. In 2011, the USFWS withdrew its proposed listing, based in part on protections offered by the 2003 RMS (FTHL Interagency Coordinating Committee 2003). As a Signatory Agency, MCAS Yuma has incorporated RMS measures into this INRMP, including participating as an FTHL Interagency Coordinating Committee member and conducting annual occupancy and demographic surveys and research.

Peirson's milkvetch (*Astragalus magdalenae peirsonii*) is listed as threatened. The plant is found primarily on the Algodones Dunes in California and the dunes of nearby Gran Desierto de Altar in northwestern Sonora, Mexico. On the BMGR, a single specimen collected in 1996 near the range's western boundary was thought to be Pierson's milkvetch; however, the specimen was subsequently assigned to a different subspecies. Peirson's milkvetch is not currently known to exist in Arizona, although suitable habitat exists in the Yuma Dunes at the BMGR West. The species was not detected on surveys conducted in 2003 and 2004 (BMGR Task Force 2005). The only Biological Opinion addressing effects of the BMGR military activities on Peirson's milkvetch was issued in 2001 (USFWS 2011). In this Opinion, the USFWS found that the actions proposed were not likely to jeopardize the continued existence of Peirson's milkvetch. The rationale for this conclusion was that relatively limited potential habitat existed and USMC activities were expected to only minimally affect those habitats (BMGR Task Force 2005). Although the species has not been found during any surveys to date, in accordance with the 2001 Biological Opinion, a re-initiation or consultation with the USFWS may be warranted if the species is found in the future.

The Sonoran desert tortoise (*Gopherus morafkai*) is not a federally listed species, but it is an Arizona SGCN. The BMGR applies conservation strategies as outlined in the Conservation Agreement which is discussed in more detail in Section 7.4.2 *Desert Tortoise Update*.

Federally threatened and endangered species that have not been documented but have the potential to occur at BMGR are listed in Table 2.6. In addition, Arizona Status and Arizona's State Wildlife Action Plan (SWAP) score are listed.

Table 2.6: Threatened and Endangered Species and Species of Greatest Conservation Need (SGCN).

Common Name ( <i>Scientific Name</i> )	Federal <sup>1</sup> Status	Arizona Status <sup>2</sup> / SWAP Score <sup>3</sup>	Species of Greatest Conservation Need	Species or Habitat			Federal Register (FR) Reference	Habitat or Potential Habitat at BMGR
				Present	Potential	Not Expected		
<b>Mammals<sup>4</sup></b>								
Lesser long-nosed bat ( <i>Leptonycteris curasoae yerbabuena</i> )		SC/1A		✓			53 FR 38456, 30 September 1988; Petition to delist: 82FR 1665, 6 January 2017; Delisted 83FR 17093, 18 April 2018	Summer resident that roosts in caves or mines and forages in desert scrub habitats (BMGR East and West).
Spotted bat ( <i>Euderma maculatum</i> )		SC/1B	✓		✓	✓		Riparian areas, rocky cliffs (BMGR West).
Southern yellow bat ( <i>Lasiurus ega</i> )		SC/NR			✓	✓		In association with palm trees, may occur in vicinity (BMGR East and West).
California leaf-nosed bat ( <i>Macrotus californicus</i> )		SC/1B	✓	✓				Year-round resident that roosts in caves or mines and forages in desert scrub or xeroriparian vegetation. (BMGR East and West).
Greater western mastiff bat ( <i>Eumops perotis californicus</i> )		NR/1B	✓	✓				Lower and upper Sonoran desert scrub near cliffs, preferring the rugged rocky canyons with abundant crevices (BMGR East and West).
Sonoran pronghorn ( <i>Antilocapra americana sonoriensis</i> )	LE	SC/1A	✓	✓			32 FR 4001, 1 March 1967	Southwestern Arizona: vegetation includes big galleta grass, six week three-awn, six weeks grama, creosote bush, bursage, and saltbush; BMGR West and East, east of the Gila and Tinajas Altas mountains (BMGR East and West).
Sonoran pronghorn ( <i>Antilocapra americana sonoriensis</i> )	XN			✓			76 FR 25593, 5 May 2011	New breeding pen at Kofa NWR, relocation of some species from existing breeding pen at Cabeza Prieta NWR to BMGR East.
Canyon Mouse ( <i>Peromyscus crinitus</i> )		NR/1C		✓				Rocky habitats or gravel sites adjacent to rocky areas (BMGR West).
Kit fox ( <i>Vulpes macrotis</i> )		NR/1B		✓				In valleys and on sandy plains in the Southwestern deserts (BMGR East and West).
Little pocket mouse ( <i>Perognathus longimembris</i> )		NR/1B		✓				Found in various types of desert scrub habitats (greasewood, rabbitbrush, creosote bush, cactus, mesquite, paloverde, etc.) (BMGR West).
Crawford’s desert shrew ( <i>Notiosorex crawfordi</i> )		NR/NA		✓				Not restricted to any particular vegetation type, so long as there is sufficient cover. They are often found in packrat houses, or under dead agaves, old logs, or other debris (BMGR West).
Desert bighorn sheep ( <i>Ovis canadensis mexicana</i> )		NR/NA	✓	✓				Desert mountain ledges and grassy basins (BMGR East and West).
Arizona wood rat ( <i>Neotoma devia</i> ) (on the list provided by MCAS Yuma, but not on the AZ SGCN list)				✓				Low desert or rocky slopes; sagebrush scrub or areas with scattered cactus, yucca, and other low vegetation. When inactive, occupies elaborate den built of debris among cacti, rocks, etc. Found only in extreme western Arizona (BMGR West).
<b>Birds<sup>5</sup></b>								
Southwestern willow flycatcher ( <i>Empidonax traillii extimus</i> )	LE	SC/1A	✓			✓	60 FR 10693, 27 February 1995; Designation of critical habitat: 78 FR 343, 3 January 2013	Well-developed riparian areas with cottonwood, willow, or tamarisk are not present.
Yuma clapper rail ( <i>Rallus longirostris yumanensis</i> )	LE	SC/1A	✓			✓	32 FR 4001, 11 March 1967	Marsh habitat not found at BMGR.

Table 2.6: Threatened and Endangered Species and Species of Greatest Conservation Need (SGCN).

Common Name ( <i>Scientific Name</i> )	Federal <sup>1</sup> Status	Arizona Status <sup>2</sup> / SWAP Score <sup>3</sup>	Species of Greatest Conservation Need	Species or Habitat			Federal Register (FR) Reference	Habitat or Potential Habitat at BMGR
				Present	Potential	Not Expected		
Bald eagle ( <i>Haliaeetus leucocephalus</i> )	BGEPA	SC/1A	✓			✓	Proposed for delisting: 64 FR 36453, 6 July 1999; Delisting: 72 FR 37346, 9 July 2007	Aquatic habitat not found at BMGR.
Golden eagle ( <i>Aquila chrysaetos canadensis</i> )	BGEPA	NA/1A		✓				Cliffs or in large trees that afford an unobstructed view (BMGR East).
Sprague’s pipit ( <i>Anthus spragueii</i> )		SC/1A	✓		✓			Winters in grassy fields along lower Colorado River from north of Yuma to Parker (may be expected occasionally at BMGR West).
Cactus ferruginous pygmy-owl ( <i>Glaucidium brasilianum cactorum</i> )		SC/1A	✓		✓			Xeroriparian areas (BMGR East and West).
Peregrine falcon ( <i>Falco peregrinus anatum</i> )		SC/1A	✓		✓			Isolated cliffs; winter migrant (BMGR East and West).
Ferruginous hawk ( <i>Buteo regalis</i> )		SC/1B	✓	✓				Arid to semiarid regions, as well as grasslands and agricultural areas (BMGR East).
Belted kingfisher ( <i>Ceryle alcyon</i> )		SC/NA	✓		✓			Found near water (fresh or salt); rare transient at BMGR.
Crested caracara ( <i>Caracara cheriway</i> )		SC/NA	✓		✓			Semi-desert, in both arid and moist habitats, but is more common in the former. Observed in Sonoran Desert NM near BMGR East.
Snowy egret ( <i>Egretta thula</i> )		SC/NA	✓		✓			Marshes, lakes, ponds, lagoons, mangroves, and shallow coastal habitats; may appear during seasonal migration (BMGR East and West).
Tropical kingbird ( <i>Tyrannus melancholicus</i> )		SC/NA	✓		✓			Situations with scattered trees, savanna, open woodland, forest edge, plantations, residential areas and agricultural lands.
Desert Purple Martin ( <i>Progne subis Hesperia</i> )		NR/1B	✓	✓				Desert Southwest in saguaro cacti cavities (BMGR East).
Gila woodpecker ( <i>Melanerpes uropygialis</i> )		NR/1B		✓				All desert habitats, nesting in saguaro cacti (BMGR East and West).
Gilded flicker ( <i>Colaptes chrysoides</i> )		NR/1B		✓				All desert habitats, nesting in saguaro cacti (BMGR East and West).
Le Conte’s Thrasher ( <i>Toxostoma lecontei</i> )		NR/1B	✓	✓				Open desert scrub, alkali desert scrub, and desert succulent scrub (BMGR East and West).
Mountain plover ( <i>Charadrius montanus</i> )		NR/1B	✓	✓				Xeric or disturbed uplands; short vegetation, bare ground, and a flat topography. Not on the AGFD Heritage Data Management System for Maricopa, Pima, and Yuma counties. However, known to occur on BMGR East, and surveys in 2011 and early 2012 identified the plover in Maricopa County (Gila Bend AFAF), and Yuma County.
Bendire’s thrasher ( <i>Toxostoma bendirei</i> )		NR/1C		✓				Relatively open desert grassland, shrubland or woodland with scattered shrubs or trees (BMGR East and West).
Black-tailed gnatcatcher ( <i>Polioptila melanura</i> )		NR/1C		✓				Desert brush, dry washes, and mesquite <i>bosques</i> (BMGR East and West).
Brown-crested flycatcher ( <i>Myiarchus tyrannulus</i> )		NR/1C			✓			Found in association with saguaros; also frequents river groves and other areas where trees are large enough to provide sites for cavity nesting (BMGR East).

Table 2.6: Threatened and Endangered Species and Species of Greatest Conservation Need (SGCN).

Common Name ( <i>Scientific Name</i> )	Federal <sup>1</sup> Status	Arizona Status <sup>2</sup> / SWAP Score <sup>3</sup>	Species of Greatest Conservation Need	Species or Habitat			Federal Register (FR) Reference	Habitat or Potential Habitat at BMGR
				Present	Potential	Not Expected		
Common poorwill ( <i>Phalaenoptilus nuttallii</i> )		NR/1C		✓				In all Sonoran Desert habitats, but most common on sparsely vegetated <i>bajadas</i> (BMGR East and West).
Costa’s hummingbird ( <i>Calypte costae</i> )		NR/1C		✓				Desert and semi-desert, arid brushy foothills, chaparral; in migration and winter also in adjacent mountains and in open meadows and gardens (BMGR East and West).
Elf owl ( <i>Micrathene whitneyi</i> )		NR/1C		✓				Deserts, dry shrublands, riparian woodlands, and open pine-oak forests (BMGR East and West).
Gray vireo ( <i>Vireo vicinior</i> )		NR/1C		✓				Non-breeding winter resident found in desert and arid scrub, semi-open areas with scattered scrub and semi-open arid brushland (BMGR West).
Hooded oriole ( <i>Icterus cucullatus</i> )		NR/1C		✓				Favors groups of palms for nesting. (BMGR East).
Lucy’s warbler ( <i>Vermivora luciae</i> )		NR/1C			✓			Mesquite <i>bosques</i> and edges of riparian woods in desert zones (BMGR East and West).
Phainopepla ( <i>Phainopepla nitens</i> )		NR/1C		✓				Scrub habitats, with desert mistletoe present for foraging (BMGR East and West).
Prairie falcon ( <i>Falco mexicanus</i> )		NR/1C		✓				Canyons, open country, grasslands, and deserts (BMGR East and West).
Scott’s Oriole ( <i>Icterus parisorum</i> )		NR/1C		✓				Yucca gardens on desert grassland prairies, but they have been found wherever yucca is growing, even on the hillsides of mountain canyons (BMGR East and West).
Varied bunting ( <i>Passerina versicolor</i> )		NR/1C		✓				Streamside thickets, brush mostly in areas of dense thorny brush, often with an upper story of scattered trees (BMGR East).
Western screech-owl ( <i>Megascops kennicottii</i> )		NR/1C		✓				Southern populations inhabit lowland riparian forests, oak-filled arroyos, desert saguaro and cardon cacti stands, Joshua tree and mesquite groves, and open pine and pinyon-juniper forests (BMGR East and West).
White-throated swift ( <i>Aeronautes saxatalis</i> )		NR/1C		✓				Rocky cliffs and canyons, typically found nesting in arid regions, but near major rivers (BMGR East and West).
Pyrrhuloxia ( <i>Cardinalis sinuatus</i> )		NR/NA		✓				Desert scrub and mesquite thickets (BMGR East).
<b>Reptiles</b>								
Colorado Desert fringe-toed lizard ( <i>Uma notata</i> )		NR/NA1		✓				Restricted to sparsely vegetated windblown sand dunes and sandy flats; it requires fine, loose sand for burrowing; vegetation is usually scant, consisting of creosote bush or other scrubby growth (BMGR East and West).
Yuman Desert fringe-toed lizard ( <i>Uma rufopunctata</i> )		SC/NR	✓	✓			Listed as Candidate: 80 FR 56423, 18 September 2015	Restricted to sparsely vegetated windblown sand dunes and sandy flats; it requires fine, loose sand for burrowing; vegetation is usually scant, consisting of creosote bush or other scrubby growth (BMGR East and West).
Flat-tailed horned lizard ( <i>Phrynosoma mcallii</i> )		SC/1A	✓	✓			Withdrawal of proposal to list: 76 FR 14210, 15 March 2011	Creosote flats, sand dunes, and mud hills in southeastern California, southwestern Arizona, and northwestern Mexico (BMGR West).

Table 2.6: Threatened and Endangered Species and Species of Greatest Conservation Need (SGCN).

Common Name ( <i>Scientific Name</i> )	Federal <sup>1</sup> Status	Arizona Status <sup>2</sup> / SWAP Score <sup>3</sup>	Species of Greatest Conservation Need	Species or Habitat			Federal Register (FR) Reference	Habitat or Potential Habitat at BMGR
				Present	Potential	Not Expected		
Desert rosy boa ( <i>Lichanura trivirgata gracia</i> )	SC	NR/NA	✓	✓				Rocky areas in desert ranges, especially in canyons with permanent or intermittent streams (BMGR West).
Mexican rosy boa ( <i>Lichanura trivirgata trivirgata</i> )	SC	NR/NA	✓	✓				On or near rocky mountains or hillsides in desert ranges, where they inhabit the granite rock outcroppings that absorb the sun’s rays providing heat and cover (BMGR West).
Desert Tortoise (Sonoran population) ( <i>Gopherus morafkai</i> )		SC/1A	✓	✓				Sonoran desertscrub and semidesert grassland, prefers rocky slopes and <i>bajadas</i> (BMGR East).
Desert night lizard ( <i>Xantusia vigilis</i> )		SC in Mohave County only / NA		✓				Arid and semiarid, among fallen leaves and trunks of yuccas, agaves, cacti, and other large plants, also in crevices of rock outcroppings and under logs and bark of foothill pines; it ranges locally into pinyon-juniper, sagebrush-blackbrush, and chaparral-oak. (BMGR West).
Long tailed brush lizard ( <i>Urosaurus graciosus</i> )		NR/NA		✓				The Lower Colorado River Sonoran Desert scrub community and can be a common sight in creosote bush- lined desert flats with sandy soil and along tree lined drainages (BMGR West).
<b>Amphibians</b>								
Western (or Great Plains) narrow-mouthed toad ( <i>Gastrophryne olivacea</i> )		SC/1C	✓		✓			Moist crevices or burrows, near ephemeral water sources (BMGR East and West).
<b>Plants</b>								
Acuña cactus ( <i>Echinomastus erectocentrus</i> var. <i>acunensis</i> )	LE	HS		✓			81 FR 14058, 16 March 2016; Designation of critical habitat: 81 FR 55265, 18 August 2017	The Arizona Upland Subdivision of the Sonoran Desert scrub biotic community, tending to be located at the western, warmer, drier perimeter of the Subdivision within the Paloverde Saguaro Association; at least three distinct clusters of an acuña cactus exist in the BMGR East (Urreiztieta 2013, Abbate 2017); the species has not been detected in the BMGR West, nor is it expected to occur.
Peirson’s milkvetch ( <i>Astragalus magdalenae</i> var. <i>peirsonii</i> )	LT				✓		63 FR 53596, 6 October 1998; Designation of critical habitat: 64 FR 47329, 4 August 2004; Petition to remove from listing—not warranted: 73 FR 41007, 17 July 2008	Slopes of mobile sand dunes in the Sonoran desert scrub plant community. No confirmed occurrences but Yuma Dunes in the BMGR West are potential habitat.
Sand food ( <i>Pholisma sonorae</i> )		HS		✓				Drifting sand below 500 ft. elevation in creosote bush scrub (Yuma Dunes in the extreme southwestern portion of the BMGR West).

<sup>1</sup> **Federal Status:** **BGEPA**=Bald and Golden Eagle Protection Act, **LE**=Endangered (U.S. Fish and Wildlife Service), **LT**=Threatened (U.S. Fish and Wildlife Service), **MBTA**=Migratory Bird Treaty Act, **NL**=Not listed, **SC**=Species of Concern (U.S. Fish and Wildlife Service), **XN**=Experimental non-essential population.

<sup>2</sup> **Arizona Status:** **HS**=Highly Safeguarded, **SC**=Species of Concern, **NA**=Not Applicable, **NR**=Not Rated.

<sup>3</sup> **Arizona State Wildlife Action plan (SWAP) score (species’ vulnerability):** **1A**=Scored 1 for vulnerability in at least one of eight vulnerability categories and matches at least one of the following: federally listed as E, T, or Candidate species; specifically covered under a signed conservation agreement or a signed conservation agreement with assurance; recently delisted federally and requires post-delisting monitoring;; closed-season species (i.e., no take permitted), as identified in Arizona Game and Fish; **1B**=Scored 1 for vulnerability, but matches none of the criteria listed under 1A; **1C**=Unknown status species.

<sup>4</sup> The Yuma puma has been omitted from the table; it had been listed as a wildlife species of concern, but genetic research completed after the list of wildlife species of concern was created showed that the subspecies ranking was incorrect.

<sup>5</sup> A list of migratory birds protected by the Migratory Bird Treaty Act can be found at 50 CFR 10.13.

### 2.3.5 Wetlands and Floodplains

Broad floodplains are associated with the major washes, which generally flow down the axes of the valleys between adjacent ranges (Klawon and Pearthree 2001). Wide floodplains are composed of mainly sand, silt, and clay, with gravelly channel deposits. These floodplains are subject to short-term flash flooding from storm events. Although flood hazards exist, the Federal Emergency Management Agency has not delineated 100-year floodplains (56 FW 2010).

Due to low amounts of precipitation in the Southwest, xeroriparian communities exist there rather than typical wetland communities. Xeroriparian areas are typically dry wash sites with denser vegetation communities than those of the surrounding desert. Larger washes are generally lined with mesquite, ironwood, paloverde, and a variety of other trees, shrubs, and herbaceous plants, whereas smaller washes may have just an occasional tree or simply contain larger trees than the surrounding plant community (BLM 2000). Xeroriparian areas are important habitats for wildlife species. Large and small mammals depend on these areas for forage and cover. Birds depend on them for nesting, forage, and predator avoidance, and they use them heavily during migration (BLM 2000).

#### ***BMGR East***

Highly ephemeral washes include Saucedo Wash, Quilotosa Wash, Daniels Arroyo, Tenmile Wash, and Midway Wash. All are tributaries to the Gila River. These systems have many large and small tributaries that are dry except after rare heavy or prolonged rain events (BLM 2000).

Bender Springs is located at the northeast corner of the range. The spring is an undependable water source and dries up during prolonged periods of drought (BLM 2000). Other natural water sources include natural depressions, similar to *tinajas* that form in wash bottoms. These depressions, rightfully named sand tanks, fill with sand and other rocky debris, but they also catch and hold water in times of runoff (BLM 2000). Because these waters are protected from the sun and wind, evaporation rates are low and water can be reliably found in them (BLM 2000).

#### ***BMGR West***

The Mohawk Valley is a large arroyo that runs along the valley's axis and eventually dissipates into progressively smaller inland deltas. These deltas drain north but never reach the Gila River as coherent channels do (Malusa and Sundt 2015).

In contrast, the Coyote Wash is a single arroyo, with islands of floodplains, which run along the entire 31 miles of the Lechuguilla Valley (Malusa and Sundt 2015). Historically, Coyote Wash joined the Gila River at the town of Wellton, but it now ends at the berm that protects the Wellton Mohawk Canal. The wash is an important feature that provides habitat for both xeroriparian plant species and wildlife (Malusa and Sundt 2015).

### 2.3.6 The BMGR Road System and Public Access

Continued surveys and monitoring of the road system have prompted Luke AFB and MCAS Yuma to propose changing the road classifications and adding recently created roads to support military

training, resource management, and law enforcement purposes. The current status of the BMGR road system and public access opportunities are addressed in the following sections.

### ***BMGR East***

The 2018 road system includes maintained roads through active target complexes, but it does not include all of the vehicle routes that are used within the complexes to construct and maintain individual targets or those used for Explosive Ordinance Disposal (EOD) clearance activities. The surface areas within target complexes affected by construction, maintenance, and EOD clearance vehicles are located in open areas that are already heavily disturbed by bombing and strafing. Vehicle operations associated with these activities contribute to the ground disturbance. Occasionally, the USAF may need to reuse a closed road when it is the only means of accessing a specific location for certain activities, such as conducting a Native American group visit to a remote cultural resource site or transporting equipment to an isolated location. The closed road would be used for such an occasion but would not be otherwise mapped, marked, or signed for other government agency use, as is done with roads classified for regular administrative use. The road would remain classified as closed and would be treated as closed for all routine government uses. When the need to reuse a closed road is identified, the USAF would evaluate the proposed use for compliance with environmental laws (e.g., to verify that no species newly listed as either threatened or endangered, or proposed for listing, under the ESA are likely to occur in the area). Closed roads that have been reclassified as recovered former roads would require careful assessment of the potential effects of the proposed reuse on their recovered status before new use of these former routes could be approved.

As indicated in Table 2.7, the active road system, as recorded in 2018, includes a total of 744 miles of roads, 170 miles of which are designated as available to provide public access. Because extensive areas of the BMGR East continue to be used on a regular basis for hazardous military activities, general public access is limited. Public access to Management Unit 6 (which includes what is known as Area B) is subject to temporary closures as needed for military purposes. Areas currently open to the public also may be closed to protect vulnerable natural or cultural resources from damage.

As outlined in Table 2.7, additional surveys and monitoring of roads have led to the changes in miles of roads as follows (Figure 2.7).

- Roads open for administrative use only in hazard/security areas has decreased by 15 miles. This difference is from the road closure at Daniels arroyo, the San Cristobal cheater road, the Cougar Canyon extension road, and the Granite Mountain access road; there was also the addition of a road intersection at the 567 segment.
- Miles of roads classified for public use inside military hazard/security areas has increased by 1 mile, from 5 to 6. This increase is due to a more accurate measurement of the roads.
- Miles of roads classified for administrative use only outside of hazard/security areas has increased from 11 to 13 miles. The increase is due to the addition of a couple of new roads.

Table 2.7: BMGR East designated road system 2012 and 2018.

<b>Road Category</b>	<b>2012</b>	<b>2018</b>
Miles of roads classified for administrative use only inside military hazard/security areas that exclude public access.	570	555
Miles of roads classified for administrative or public use inside military hazard/security areas	5	6
Miles of roads classified for administrative use only outside of restricted military hazard/security areas	11	13
Miles of roads classified for public use outside of restricted military hazard/security areas but subject to temporary closure for military purposes	170	170
<b>Total Miles of Road</b>	<b>756</b>	<b>744</b>

**BMGR West**

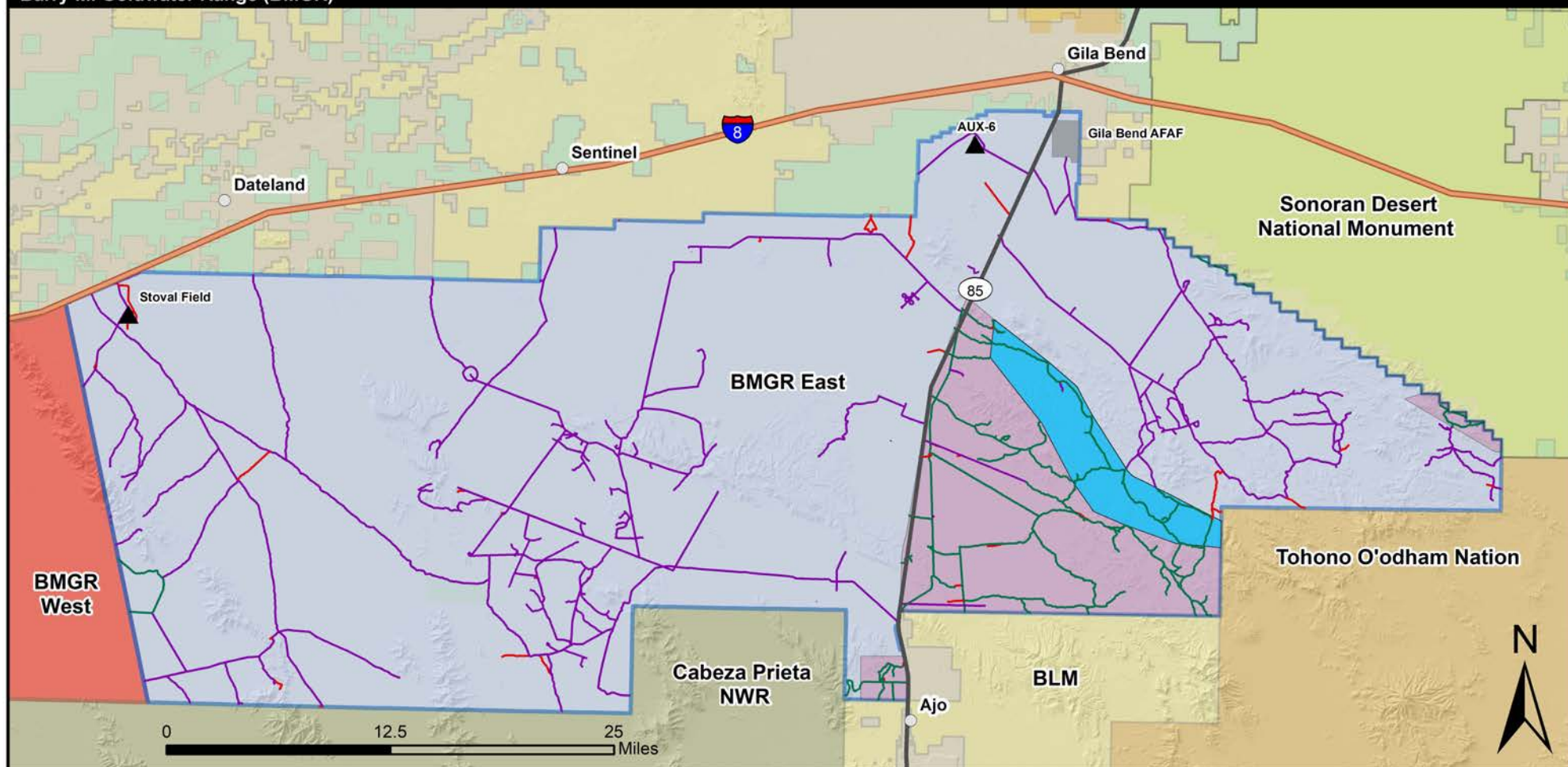
The designated road system continues to function as documented in the 2012 INRMP, with a few minor exceptions. The 2012 INRMP reported three road designations: miles of administrative use only roads inside military hazard/security areas, miles of administrative use only roads outside of military hazard/security areas, and miles of roads classified for administrative or public use outside of restricted military hazard/security areas. For 2018, the road designation system was simplified to include only two categories: miles of roads classified for administrative use only and miles of roads classified for public and administrative use. The difference in miles of administrative use only roads is due to more accurate surveys of the roads. No new roads have been added to the BMGR West during the 2012–2018 timeframe.

The area available for general public access continues to include about 75 percent of the BMGR West. All or portions of the public use area are subject to occasional temporary closures to support military activities that present safety hazards and/or have security requirements.

Figure 2.7: BMGR East Travel Management

Barry M. Goldwater Range (BMGR)

2018-2023 Integrated Natural Resource Management Plan (INRMP)



## Legend

- |                   |   |
|-------------------|---|
| ○ City/Town       | Sonoran Desert NM   |
| Interstate 8      | Tohono O'odham Nation   |
| State Route 85    | BLM   |
| BMGR East         | State Trust Land  |
| BMGR West         | Hazard Area - Access is only granted when range is closed. Valid permit required. |
| Gila Bend AFAF    | BMGR East Public Access   |
| Cabeza Prieta NWR |   |

## BMGR East Designated Road System

- |   |
|---|
| Road for Administrative (Government) Use Only |
| Road Closed                                   |
| Road Open for Public and Administrative Use   |
| Auxiliary Airfield (AUX)                      |

World Geodetic System 1984  
(WGS84) Projection  
Zone 12 N  
GCS\_WGS\_1984

Base data from ESRI StreetMap  
Hillshade derived from USGS NED

Created By:  
 Center for  
Environmental  
Management  
MILITARY LANDS  
Colorado State University



The active road system includes a total of 636 miles of active roads, including 427 miles of public access roads (Table 2.8 and Figure 2.8).

Table 2.8: BMGR West Designated Road System 2012 and 2018.

Road Category	2012	2018
Miles of roads classified for administrative use only	195	209
Miles of roads classified for public and administrative use	427	427
<b>Total Miles of Road</b>	<b>622</b>	<b>636</b>

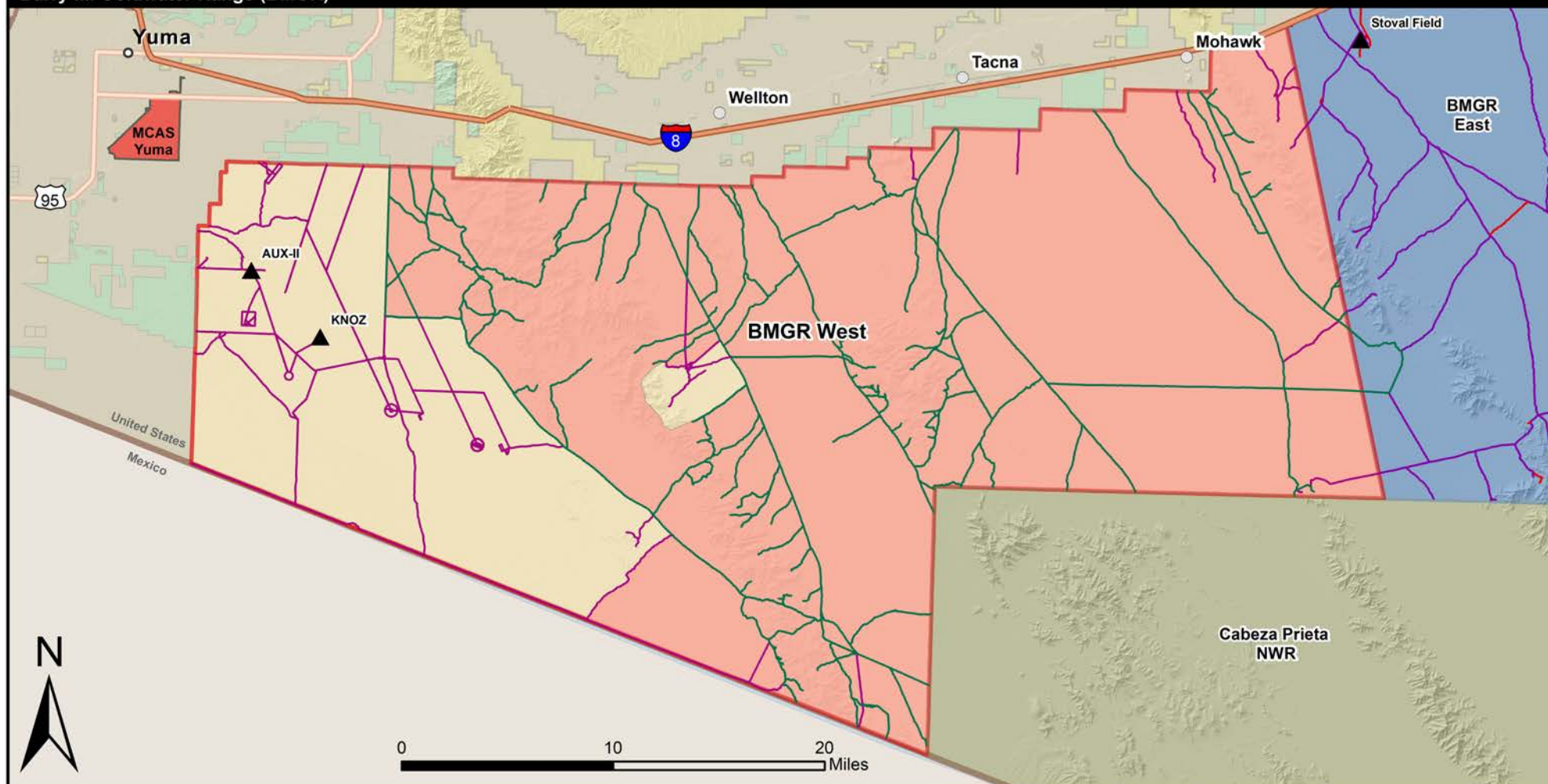
As outlined in Table 2.8, additional surveys and monitoring of roads have led to the changes in miles of roads as follows.

- Miles of road classified for administrative use only has changed from 195 miles to 209 miles. The change in road mileage is due to more accurate road surveys.

Figure 2.8: BMGR West Travel Management

Barry M. Goldwater Range (BMGR)

2018-2023 Integrated Natural Resource Management Plan (INRMP)

**Legend**

- City/Town
- Interstate 8
- Highways
- BMGR West
- BMGR East
- MCAS Yuma
- Cabeza Prieta NWR
- BLM
- State Trust Land
- BMGR West Public Access
- ▲ Auxiliary Airfield (AUX)

**BMGR West Designated Road System**

- Road for Administrative (Government) Use Only
- Road for Public and Administrative Use

World Geodetic System 1984  
(WGS84) Projection  
Zone 11 N  
GCS\_WGS\_1984

Base data from ESRI StreetMap  
Hillshade derived from USGS NED

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## 2.4 Mission Impacts on Natural Resources

### 2.4.1 Natural Resource Constraints to Mission and Mission Planning

Natural resource constraints on the mission and mission planning include a combination of factors. Federal and state environmental laws and regulations, as well as physical and ecological factors can affect the use of the range and other facilities. Similarly, conservation measures included in biological opinions and conservation agreements can constrain military operations.

Operations and development on much of BMGR are affected by the presence of Sonoran pronghorn. Due to its endangered status, all actions at BMGR that may affect Sonoran pronghorn must undergo section 7 (of the ESA) consultation. Approximately 70 percent of BMGR East and 36 percent of the BMGR West are within Sonoran pronghorn habitat (Figures 7.4 and 7.5). At BMGR East, air and ground operations on the NTAC, STAC, and Range 1 are affected by the presence of animals in the vicinity of targets and along roads, and in any proposed development or expansion of facilities on these ranges or below the air-to-air range (generally throughout the area west of SR-85). These operations must take into account their potential impacts on pronghorn habitat and species recovery. In order to enhance fawn recruitment, the 56 FW schedules range maintenance and explosive ordnance clearances on NTAC and STAC outside the fawning season.

Concerted efforts of the USAF, USMC, AGFD, USFWS, and other members of the recovery team have resulted in improved status of Sonoran pronghorn through the implementation of numerous recovery actions (e.g., habitat protection and enhancements, establishment of a non-essential experimental population, construction and maintenance of wildlife waters). These and other actions are part of the recovery plan and, if successful, will lead to downlisting and, ultimately, delisting of the species. In the interim, however, the increased numbers of animals on the range has the potential to increase mission constraints. On the BMGR East, daily monitoring of target areas on NTAC, STAC, and Range 1 typically results in closing several targets to ordnance delivery for the day because of the presence of one or more animals in the immediate vicinity. It is anticipated that target closures will increase with population increases, and this will further constrain mission execution unless procedures currently in place evolve to mitigate this effect. That said, the USFWS has worked with the military to reduce mission constraints. For example, in 2010, the USFWS issued a non-jeopardy biological opinion with authorized incidental take of multiple pronghorn. The opinion allowed for reduced target closure distances to reduce constraints on the military, while still minimizing risks to pronghorn from military operations. Additionally, the USFWS has provided feed and water near the range boundaries (east, west, and south) in an attempt to lure pronghorn away from actively used targets. These activities are discussed in detail in Section 7.4.1 *Sonoran Pronghorn*.

Under the terms of a 2016 Candidate Conservation Agreement (USFWS et al. 2015), the 56 FW and MCAS Yuma agreed to implement measures to protect the Sonoran Desert tortoise (see Section 7.4.2) and its habitat. The current tortoise distribution includes all of BMGR. The provisions of the INRMP, especially road and vehicle travel management, contribute to the protection of the species. Both USAF and USMC travel management services are committed to keeping off-road vehicle use to the minimum required for range maintenance and operations. Another agreed-upon measure identified in the Candidate Conservation Agreement is to schedule explosive ordnance clearances and range

maintenance in sensitive areas at BMGR East (primarily the ETAC Range) during seasons when the tortoise is less active. Combined with the scheduling constraints imposed by avoiding the pronghorn fawning season, this restriction precludes significant flexibility in scheduling tactical range clearance and maintenance closures.

Birds and wildlife represent significant threats to flight safety and can impact the timing of aircraft operations and training. Bird/Wildlife Aircraft Strike Hazard (BASH) concerns are greatest during landings or takeoffs or when aircraft fly at low altitudes, rather than during in-flight operations that are typical at the BMGR. A BASH Reduction Plan is in place at the BMGR East and West and is discussed in detail in Section 7.12 *Bird/Wildlife Aircraft Strike Hazard*.

The invasion of Sahara mustard, primarily in the BMGR West, has the potential to limit ground or air-to-ground based training in areas where it forms dense monocultures. These monocultures can be a fuel source, increasing fire danger when there are ignition sources such as vehicles and air-to-ground artillery. The spread of Sahara mustard is currently being controlled through mechanical and chemical removal. A discussion on the impacts and control efforts for Sahara mustard, and other invasive species, is provided in Section 7.11.1 *Invasive Species*.

Erosion resulting from road construction and improvement and the use of unauthorized off-road vehicles has occurred in isolated areas. Fugitive dust from erosion has the potential to disrupt training due to reduced visibility, fouling of mechanical and electrical systems, and effects on the health of personnel training at the BMGR.

## 2.4.2 Land Use

Although the BMGR is technically a withdrawn land area, from the perspective of supporting military operations, the range is composed of both lands and overlying restricted airspace reserved for military purposes (Figures 2.9–2.11). The restricted airspace dimensions of the BMGR remain unchanged from those that were in effect following the implementation of the MLWA of 1999. The four restricted airspace areas overlying the range—R-2301W, R-2301E, R-2304, and R-2305—are designated by the Federal Aviation Administration to support the military training missions of the range. The BMGR currently supports a wide diversity of tactical aviation training activities as well as selected ground training and training support operations.

Tactical surface and aviation training has not impacted or modified the environment. The ongoing and foreseeable military use of the BMGR depends, in large part, on the conservation, protection, and management of natural resources and the regulation of public use and safety.

Air and land space that directly support regular military training activities serves principally to provide

- the surface space needed to adequately disburse activities so that realistic training can regularly occur either as independent but simultaneous events or as large-scale, combined action events;
- the flexibility to host irregularly scheduled training or testing activities, (e.g., air-to-air missile shoots or long-range air-to-ground weapons deliveries) that require restricted air and land space configurations that cannot be accommodated by standard weapons ranges

or other activity areas; and

- buffers that permit multiple independent training events to safely occur simultaneously on a non-interference basis and that also protect public safety.

Although substantial changes have occurred over the decades in aircraft, weapons, and warfighting tactics, the corresponding development and improvements in weapons ranges and other training sites has led to only a modest and usually incremental expansion in the footprint of surface use needed to directly support training activities. The basic configurations of the weapons ranges established from 1950 through the 1980s, coupled with necessary upgrades and routine maintenance, have enabled many of these facilities to provide long-standing and sustainable training support. As a result, the aggregate footprint of surface disturbance after several decades of range use that affects ground surfaces, surface hydrology, and/or vegetative communities in more than a negligible way has remained at the low level of approximately 12.8 percent. Therefore, the primary focus of ecosystem and biodiversity management at BMGR has been landscape-level protection and conservation rather than manipulation or restoration. Similarly, the primary focus of protected species management has been the protection and conservation of existing natural habitats.

The current endangered or threatened status of protected species at the BMGR has resulted largely from historical and ongoing losses of off-range habitat, disease, adverse climatic trends, and other negative effects of non-military activities. Although military activities pose some risks to certain species, these potential effects are comprehensively mitigated, and military use of the range has not been found to jeopardize any protected species. In fact, effects of substantial habitat protection at BMGR have contributed markedly to the continued existence and recovery potential of the pronghorn and continued conservation of the FTHL. Additional information on the Sonoran pronghorn, FTHL, and other protected or sensitive species, is provided in Section 7.4 *Management of Threatened and Endangered Species*.

### **BMGR East**

The BMGR East land area is currently divided into eight aviation subranges for safely supporting multiple and simultaneous training or other operations. The BMGR East also includes Gila Bend AFAF, Stoval Auxiliary AUX, and AUX-6 to support training in forward area airfield operations, observation points, and other facilities.

In 2010, proposed range enhancements were analyzed in the *Final Environmental Impact Statement for Proposed BMGR East Range Enhancements* (USAF 2010) and approved for implementation in a Record of Decision (ROD). Since implementation of the 2012 BMGR INRMP, the following enhancements either have been completed or may occur during the five-year planning period covered by the INRMP (2018–2023).

- Convert Range 3 into a helicopter gunnery range to better support the specialized training needs of rotary-wing users. Construction of the range has been completed and use of the area for gunnery training has begun. Improvements to the original design are to be made as part of ongoing maintenance.
- Construct a new taxiway and a new air traffic control tower at Gila Bend AFAF. These improvements would enhance the safety of operations, eliminate the need for waivers of

certain airfield criteria, and enhance the capability of Gila Bend AFAF as a divert airfield for aircraft experiencing in-flight emergencies while operating from the BMGR East. The new control tower would meet the minimally acceptable visual surveillance or depth-perception standards specified by the Unified Facilities Criteria for military airfields. This action was selected for implementation in a ROD, but funding for the project is not yet available.

- Pave approximately 7 miles of an existing graded road between the main tower and Range Munitions Consolidation Points (also referred to as the Water Well) at Range 1 to eliminate dust generated by the ongoing heavy use of the existing road; decrease road maintenance requirements by providing a cost-effective, durable, and long-lasting maintenance solution; and reduce the vehicle maintenance burden resulting from disproportionate wear and tear on USAF vehicles that frequently travel on this road. Paving this road is subject to the availability of funds; expected completion date is 2020 or sooner.
- Develop a moving vehicle target in North Tactical Range (NTAC) to provide aircrews with realistic training in attacking mobile ground targets. A moving target operating on an existing road on the ETAC has been in use (for strafing only) since 2010; however, a more robust moving target complex to support bomb and rocket employment is needed. A location on NTAC was selected in a ROD. This action has not been implemented.

The remaining “enhancements” described in the 2010 Environmental Impact Statement (EIS) are designed to improve operations but do not involve construction on the range.

- Lower the operational floor of R-2301E restricted airspace over the Cabeza Prieta NWR to enable fixed-wing aircraft aircrews to perform realistic low-level attacks on targets located in the South Tactical Range (STAC) and realistic low-level air-to-air intercepts in the air-to-air combat tactics Range. Currently, overflights of the refuge are restricted to altitudes of 1,500 feet AGL or higher, except within approved corridors, under the terms of a 1994 MOU between the DoD and DOI. The 2010 EIS assessed proposals to lower the overflight floor to 500 feet AGL to support low-level attack and intercept training that would provide combat conditions that aircrews may encounter in real-world scenarios. Implementation of this approved action will not occur until the MOU is renegotiated.
- Authorize additional ground-based training for combat search and rescue teams, special operation teams, USMC units, and potentially other small squads of troops that involve clandestine insertions and extractions from helicopters or vehicles, cross-country land navigation, and other activities while traveling in stealth on foot. The 2010 EIS assessed proposals to expand the opportunities for this type of training. Helicopter insertions and extractions and vehicle movements associated with this training would be restricted to existing helicopter landing zones and roads. This proposal has been implemented.
- Establish streamlined procedures to facilitate environmental reviews and approvals for reconfiguring or otherwise updating tactical range targets on a timely basis to provide training that reflects the combat conditions that U.S. warfighters will encounter when meeting real world threats. This proposal has been implemented.

***BMGR West***

MCAS Yuma organizes its air and ground combat forces into Marine Air Ground Task Forces, which form the fundamental cornerstones of modern USMC combat doctrine. These forces are scalable and tailored for specific missions (e.g., humanitarian assistance, emergency response, peacekeeping, specific regional threat, and major war abroad) that integrate air and ground assets to accomplish the assigned mission. With the exceptions of the R-2301W restricted airspace being divided into four aviation subranges, all of the listed training facilities and features are ground-based.

The USN approved development of the Auxiliary Landing Field (ALF) complex to support Marine Corps F-35B training for the West Coast basing of the F-35B aircraft (USFWS 2010a). Construction was completed in 2015. The F-35 will replace the AV-8B aircraft in USMC squadrons based at MCAS Yuma. The current military features, facilities, and uses are shown in Figure 2.11 and detailed in Table 2.10 with notations as to whether they were constructed after 2012

Table 2.9: BMGR East current military training facilities, features, and use.

Area/Activity	Description of Current Training Feature, Facility, and Military Use	Status Since 2012 INRMP
BMGR East Land Base	BMGR East, which represents 60 percent of the total BMGR acreage, is divided into 8 subranges (numbered and tactical ranges, and the air-to-air range—as described below) that may be scheduled separately to support multiple missions or scheduled together for larger exercises and events.	Unchanged
Restricted Airspace	The areas defined by R-2301E, R-2304, R-2305 lateral boundaries, the altitude floors and ceiling remain unchanged since before 1960. They are not affected by the land withdrawal. R-2301E overlies most of the BMGR East land area, including Stoval AUX, two tactical ranges (NTAC and STAC), three of the four numbered ranges (1, 2, and 4), and the Air-to-Air range. The area extends from the surface to 80,000 feet AMSL. R-2304 overlies ETAC, part of Area B, which is open to the public by permit, and a small portion of the Tohono O'odham Nation. R-2305 overlies Range 3 and its facilities and extends south over a portion of Area B. The vertical limits of both R-2304 and R-2305 are surface to 24,000 feet AMSL.	Unchanged
Numbered Ranges	Four numbered ranges capable of supporting Class A (scored) operations support primary instruction in air-to-ground delivery of bombs, rockets, and gunnery (inert/training ordnance only). The airspace associated with these ranges may be scheduled concurrently with adjacent tactical ranges as needed. Facilities on and use of these subranges remain almost entirely unchanged since well before the 2012 INRMP update. The single exception was conversion of the left side of Range 3 to a helicopter gunnery range. Construction of this facility began in 2012; it has since been completed and is in use.	Changed
Tactical Ranges	Three tactical ranges (NTAC, STAC, and ETAC) support aircrew training in gunnery, bomb, rocket, and missile employment. Targets simulate tactical features such as airfields, railroad yards, missile emplacements, truck convoys, urban areas, and enemy compounds. Threat simulators may be included in training scenarios to better reflect real-world conditions. Only practice ordnance may be employed on most targets; high-explosive ordnance may be used only on six targets specifically designated for this purpose. The tactical ranges continue to be used on a daily basis for ordnance delivery training. A remotely operated vehicle target operates on an existing road in ETAC and is used for strafing only.	Unchanged

Table 2.9: BMGR East current military training facilities, features, and use.

Area/Activity	Description of Current Training Feature, Facility, and Military Use	Status Since 2012 INRMP
Air-to-Air Range	A portion of this range may be used for air-to-air gunnery and missile firing; however, these operations are scheduled infrequently. This area is used daily for aerial combat and maneuvering training with no ordnance expenditure.	Unchanged
Range Munitions Consolidation Points (RMCPs)	RMCPs 1, 2, 3, and 4 continue to serve as range EOD and maintenance support areas. Expended munitions, munitions scrap, and target debris that is safe for handling is cleared from the three tactical and four manned ranges and transported to the RMCPs for demilitarization and decontamination processing before being released for off-range recycling or disposal. The RMCPs are also used as staging locations for target construction, maintenance, and replacement operations. The use and configuration of these areas are unchanged since the 2012 update.	Unchanged
EOD Training Range	The EOD Training Range continues to be used for instructing EOD technicians to perform safe detonations of expended but unexploded ordnance. Detonation of high-explosive charges weighing up to 2,000 pounds net explosive weight is authorized in this area.	Unchanged
Small Arms Range	Since 2012, minor improvements and repairs to the Small Arms Range have been completed. The range continues to be used almost daily for small arms training by the BP and, occasionally, by USAF Security Police.	Changed
Gila Bend AFAF	Gila Bend AFAF continues to serve as the operational support center for the BMGR East. It includes an 8,500-foot runway, six helipads, and other airfield facilities, as well as offices, workshops, storage, lodging, and other spaces. No active duty personnel or aircraft are permanently based at Gila Bend AFAF. Construction of a taxiway for the runway and a new air traffic control tower were assessed in an EIS and selected in a ROD for implementation; however, funds to complete these projects are not yet available. Ongoing maintenance and improvement of facilities at Gila Bend AFAF are routinely conducted.	Unchanged

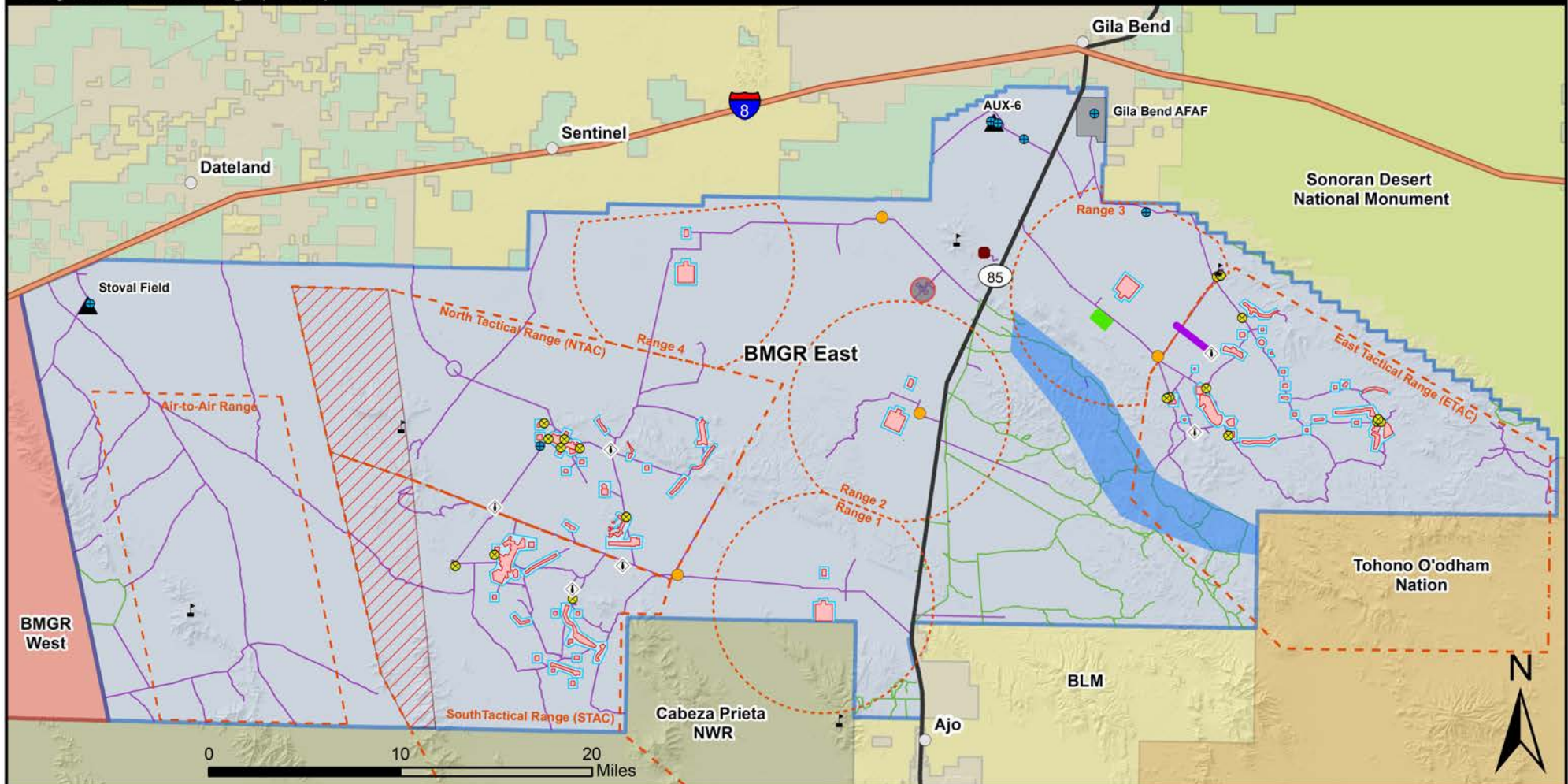
Table 2.9: BMGR East current military training facilities, features, and use.

Area/Activity	Description of Current Training Feature, Facility, and Military Use	Status Since 2012 INRMP
Assault Landing Zones (Auxiliary Airfields)	Auxiliary Airfield (AUX) 6 and Stoval airfields are World War II era triangular airfields used for certain limited training activities. AUX-6 is regularly used for C-130 and helicopter operations by USAF, USMC, and ARNG units. Since 2012, upgrades to runway surfaces have improved the safety of these operations. Stoval airfield, on the far west side of the BMGR East, is used by USMC units, primarily during the twice-yearly weapons and tactics instructor courses. Landing zone and drop zone operations are conducted at both these locations. AUX-11 is no longer used as an airfield, but serves as a site for exercise-specific communications operations.	Unchanged
Sand and Gravel Excavation and Stockpile Areas	Excavation of sand and gravel from ten wash locations in the BMGR East and stockpiling of these materials at five sites for later on-range use is approved but not yet implemented; a permit from Maricopa County is required. The sand and gravel may be used in target construction or road repairs as needed.	Unchanged
EOD Clearance	EOD clearances occur annually, every two years, and every 10 years. Annual clearances entail removing expended ordnance and target debris on the surface within 50 feet of roads and target access ways and in the vicinity of targets to maintain safe work areas for maintenance, reconstruction, or replacement of targets. Every two years, ordnance and target debris on the surface is cleared inside a 300-foot radius around each inert/practice ordnance target and inside a 500-foot radius around each live ordnance target. Every ten years, ordnance and target debris on the surface is cleared inside a 1,000-foot radius around each inert/practice and live ordnance target. No EOD clearances are conducted within the Air-to-Air subrange.	Unchanged
Air Combat Training Systems	Air Combat Training Systems provide a variety of technologically advanced equipment and support capabilities, including the Range Operations Coordination Center (Snakeye), Air Combat Maneuvering Instrumentation, scoring and feedback systems, and simulated ground-to-air threats. Electronic equipment is continually upgraded; some remote equipment locations, both on and off range, are no longer needed.	Unchanged

Figure 2.9: Current Military Use at BMGR East

2018-2023 Integrated Natural Resource Management Plan (INRMP)

Barry M. Goldwater Range (BMGR)



## Legend

- |                         |  |   |
|-------------------------|--|---|
| ○ City/Town             | ✈ Air Combat Maneuvering System              | --- Numbered Range Boundary (air)   |
| — Interstate 8          | ● Air Force Small Arms Range                 | --- Tactical Range Boundary (air)   |
| — State Route 85        | ● Range Munitions Consolidation Point (RMCP) | ■ Helicopter Gunner Range   |
| ■ BMGR East             | ● Parachute Drop Zone                        | ■ Moving Vehicle Target   |
| ■ BMGR West             | ▲ Auxiliary Airfield (AUX)                   | ■ EOD 2-Year Clearance Area   |
| ■ Gila Bend AFAF        | ● Helicopter Landing Zone                    | ■ EOD 10-Year Clearance Area  |
| ■ Cabeza Prieta NWR     | — Moving Vehicle Target                      | ■ Hazard Area - Access is only granted when range is closed. Valid permit required. |
| ■ Sonoran Desert NM     | ● Smokey SAMs Launch Site                    | ■ Hazard Area - NTAC and STAC   |
| ■ Tohono O'odham Nation | ■ EOD Training Range                         |   |
| ■ BLM                   |  |   |
| ■ State Trust Land      |  |   |

## BMGR East Roads

- Road for Administrative (Government) Use Only
- Road Open for Public and Administrative Use

World Geodetic System 1984  
(WGS84) Projection  
Zone 12 N  
GCS\_WGS\_1984

Base data from ESRI StreetMap  
Hillshade derived from USGS NED

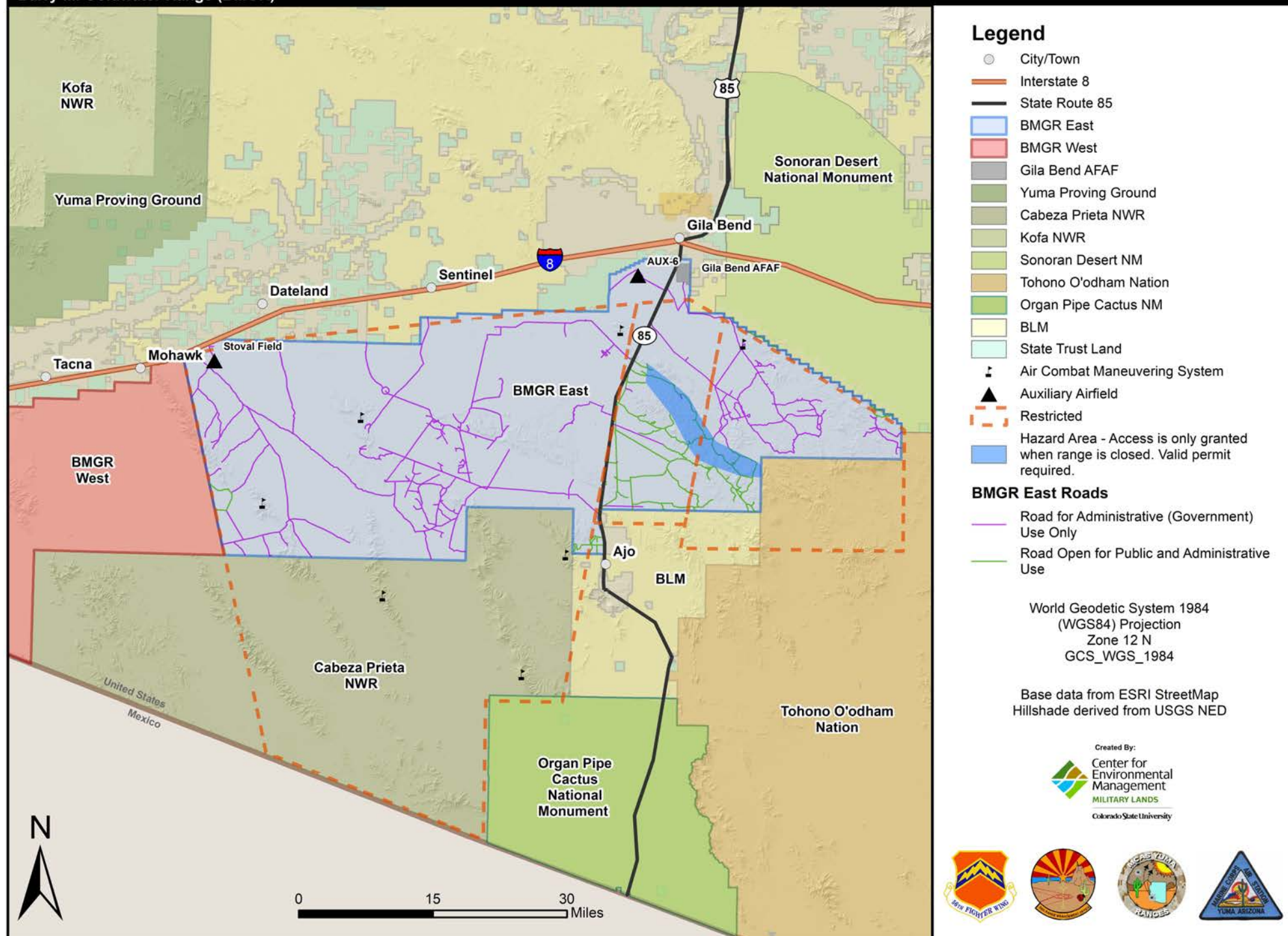
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Figure 2.10: Restricted Airspace at BMGR East

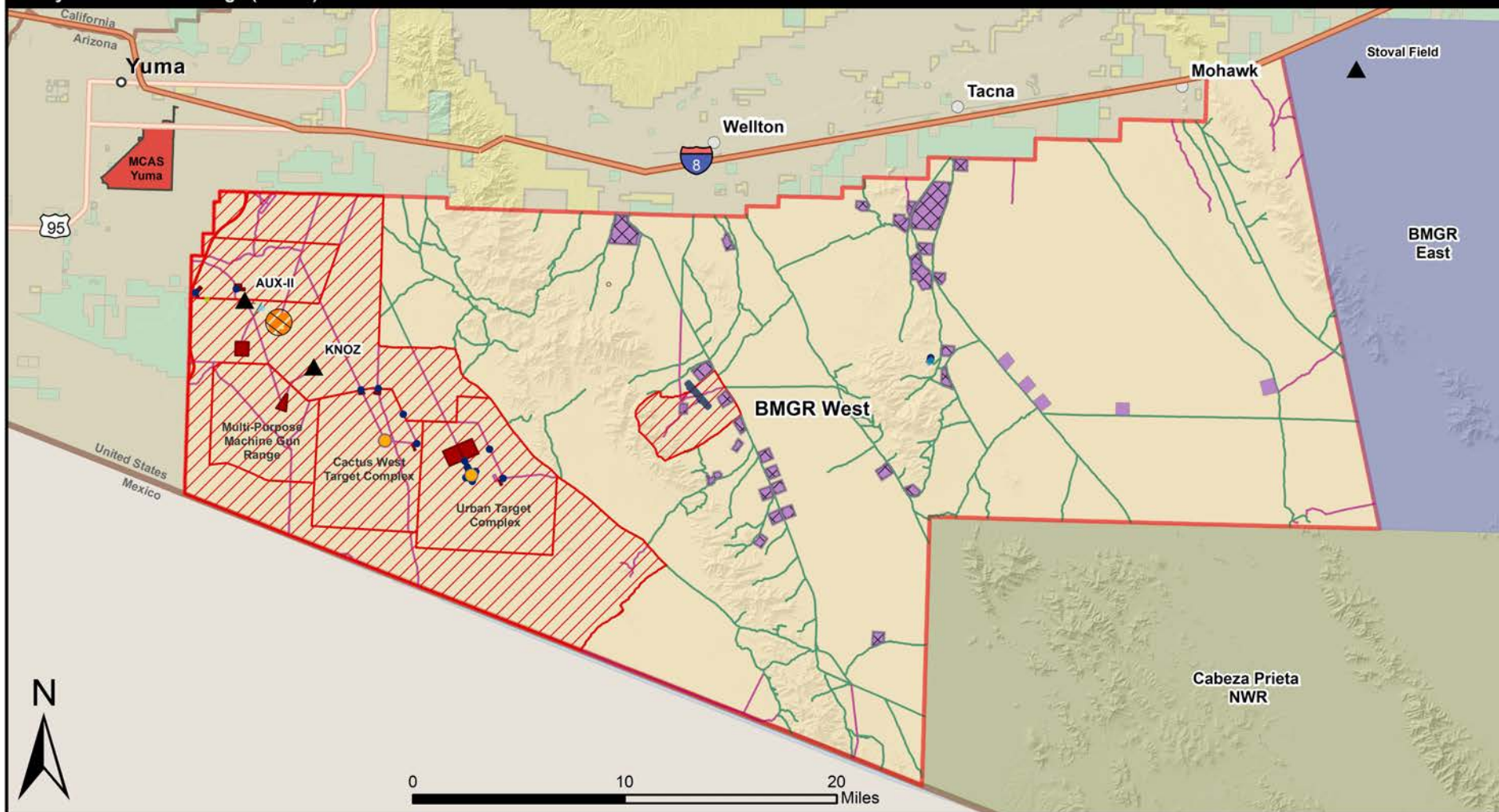
Barry M. Goldwater Range (BMGR)

2018-2023 Integrated Natural Resource Management Plan (INRMP)



**Figure 2.11: Current Military Use at BMGR West**  
Barry M. Goldwater Range (BMGR)

2018-2023 Integrated Natural Resource Management Plan (INRMP)



## Legend

- |                   |   |                               |  |
|-------------------|---|-------------------------------|--|
| Interstate 8      | State Trust Land                              | Urban Infantry Training Range | Restricted Access/Hazard Areas                 |
| Highways          | <b>BMGR West Military Training</b>            | Auxiliary Airfield (AUX)      | BMGR West Designated Admin Use Only Road       |
| City/Town         | Aerial Bombing Range                          | Landing Zone Area             | BMGR West Designated Public and Admin Use Road |
| MCAS Yuma         | AUX II Bivouac Site                           | Impact Area                   |  |
| BMGR East         | Gas Chamber for Personal Equipment Operations | Observation Position Point    |  |
| BMGR West         | Ground Support Area                           | Parachute Drop Zone           |  |
| Cabeza Prieta NWR |   | Training Range                |  |
| BLM               |   |                               |  |

World Geodetic System 1984  
(WGS84) Projection  
Zone 11 N  
GCS\_WGS\_1984

Base data from ESRI StreetMap  
Hillshade derived from USGS NED

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Table 2.10: BMGR West current military training facilities, features, and use.

<b>Range Feature or Facility</b>	<b>Description of Current Training Feature, Facility and Military Use</b>	<b>Status Since 2012 INRMP</b>
<b><i>Surface Area and Airspace</i></b>		
BMGR West Surface Area	BMGR West represents approximately 40 percent of the total BMGR acreage. Boundary and land withdrawal areas are as established by the MLWA of 1999.	Unchanged
Restricted Airspace	R-2301W lateral boundaries, altitude floor (ground surface), and altitude ceiling (80,000 ft. AMSL) remain unchanged since 1960.	Unchanged
Airspace Subranges	Four airspace subranges, including TACTS-Hi, TACTS-Low, Cactus West, and AUX-II, are allocated to one or more subranges or are aggregated into larger units as needed to support training.	Unchanged
<b><i>Aviation Training Ranges and Facilities</i></b>		
AUX-II	AUX-II provides an assault landing zone airstrip for training aircrews of C-130 aircraft to operate in and out of a primitive landing zone in a forward area. AUX-II also continues to be used as a staging area or forward arming and refueling point for helicopter operations.	Unchanged
F-35B ALF	Construction of the F-35B ALF (known as KNOZ) was completed in 2015. The ALF includes three simulated landing helicopter assault decks, flight control towers, aircraft maintenance shelter, refueling apron, and a fire and rescue shelter.	Changed
Cactus West Target Complex	Cactus West Target Complex includes (1) a bull's-eye target located inside a 1,500-foot radius bladed circle, and (2) two-berm and panel targets for strafing practice. Ordnance deliveries are restricted to inert and practice munitions. As described later in this table, the Cactus West Target receives impacts from the Convoy Security Operations Course 2 Range and as a Live Ordnance and Drop Tank Jettison Area.	Unchanged
Urban Target Complex (UTC)	The UTC provides a simulated urban setting with streets, 240 buildings, multiple targets, and vehicles for training aircrews in precision air-to-ground attack in densely developed and populated areas. The UTC Range is located inside the fenced area. The complex also has a moving land target, which consists of a remotely controlled vehicle that pulls a target sled on an oval track.	Unchanged

Table 2.10: BMGR West current military training facilities, features, and use.

Range Feature or Facility	Description of Current Training Feature, Facility and Military Use	Status Since 2012 INRMP
Instrumentation	A portion of the TACTS Range is instrumented to support air-to-air and air-to-ground combat training. The electronic architecture is composed of 27 fixed-position and 17 mobile-positions that can track, record, and replay the simultaneous actions of 36 aircraft and scoring weapon use. The air-to-ground weapons delivery component is supported by 112 individual passive tactical target sites situated in 11 complexes that simulate airfield installations, power stations, fuel storage facilities, buildings, railway facilities, anti-aircraft missile and gun positions, and military vehicles. No munitions are fired or otherwise released on this electronically scored range.	Unchanged
<b><i>Air-Ground Training Facilities</i></b>		
Ground Support Areas	Thirty-three undeveloped ground support areas allow units to participate in off-road training exercises. Most ground troop deployments are coordinated with aviation training exercises to enhance the realism of air-ground training evolution for both elements.	Unchanged
Parachute Drop Zones (DZ)	Twenty-one parachute tactical DZs are currently designated. The AUX-II DZ is located within a previously disturbed, inactive bull's-eye bombing target. The DZ immediately to the East of AUX-II is the only DZ approved for parachute cargo drops, which require retrieval by an off-road combat fork lift. The other 10 DZs are located within ground support areas to minimize off-road driving for retrievals.	Unchanged
<b><i>Ground Combat Training Ranges</i></b>		
Rifle and Pistol Ranges	The Rifle and Pistol Ranges are used to train and qualify personnel in the use of small arms.	Unchanged
Small Arms Live-Fire Maneuver Range (Range 2)	The Small Arms Live-Fire Maneuver Range is located in an unused sand and gravel borrow pit and serves as a close combat maneuvering range for training small teams or individuals in the tactical use of infantry small arms.	Unchanged

Table 2.10: BMGR West current military training facilities, features, and use.

Range Feature or Facility	Description of Current Training Feature, Facility and Military Use	Status Since 2012 INRMP
Multi-Purpose Machine Gun Range (Panel Stager)	The Multi-Purpose Machine Gun Range is located at the inactive air-to-ground bombing target at Panel Stager Range 2. Ground-to-ground machine gun fire of .50 caliber and smaller is directed from guns mounted on vehicles traveling on existing access roads at target sets located in the retired bombing impact area.	Unchanged
Convoy Security Operations Courses 1 and 2 and Murrayville (East and West)	Four Convoy Security Operations Courses are designed to train troops assigned to protect vehicle convoys in combat theaters and how to recognize, counter, and defeat threats from hostile forces. Static and pop-up targets that simulate threats are located in ambush scenarios along the access roads and run-in line. These are located along the existing access roads in the vicinities of the Cactus West Target Complex, UTC and along the run-in line to the UTC. Ground-to-ground machine gun fire of .50 caliber and smaller may be directed from guns mounted on vehicles or run-in-line at target sets designed to simulate ambush attacks by hostile forces. The direction of fire from the access roads in the vicinity of the Cactus West complex is generally to the south such that the Cactus West target impact area is affected. The direction of fire from the run-in-line is generally at target sets to the east or west such that the existing target impact areas at the UTC also serve as an impact area.	Unchanged
Combat Village	Combat Village simulates a small building complex adjacent to a railroad. This facility is used as an electronically scored target and for training small units in infantry tactics involving reconnaissance, assaults, or defense. Only blank small arms munitions and a special effects small arms marking system are authorized for use at this infantry tactics training site.	Unchanged
Hazard Areas	Five hazard areas, four to the west and one to the east of the Gila and Tinajas Altas mountains, support use of small arms and/or aircraft lasers in training operations. Surface entry to hazard areas is closed to nonparticipating personnel when hazardous activities are scheduled.	Unchanged
<b>Support Areas</b>		
Cannon Air Defense Complex	The Cannon Air Defense Complex provides administrative, maintenance, and training areas for a Marine Air Control Squadron. The complex is a permanent built-up facility of about 192 acres.	Unchanged

Table 2.10: BMGR West current military training facilities, features, and use.

Range Feature or Facility	Description of Current Training Feature, Facility and Military Use	Status Since 2012 INRMP
AUX-II Field Ammunition Supply Point	The Field Ammunition Supply Point, located about 1,500 feet northwest of AUX-II, provides temporary secure storage for munitions used by ground units during field exercises, primarily during semi-annual weapons and tactics instructor courses.	Unchanged
Munitions Treatment Range	The Munitions Treatment Range is used to train personnel in the use of demolition explosives and unexploded ordnance.	Unchanged
Live Ordnance and Drop Tank Jettison Area	The Cactus West Target bull's-eye is used as a Live Ordnance and Drop Tank Jettison Area for aircraft experiencing difficulties that warrant a precautionary jettisoning of external stores prior to recovery at MCAS Yuma. Panel Stager Range 2 is presently used as the impact area for the Multi-Purpose Machine Gun Range.	Unchanged

### 2.4.3 Current Major Impacts

#### 2.4.3.1 Impacts from Invasive Species

The spread of invasive plant species impacts the range by altering native vegetation communities and modifying the resiliency of the landscape and its ability to adapt to future stressors. These impacts may also affect future military training missions and degrade critical wildlife habitat. Invasive plants displace native vegetation through direct competition and by altering the natural Sonoran Desert fire regime. The spread of invasive species, such as Sahara mustard and buffelgrass (*Pennisetum ciliare*), leads to increasing fuel loads and altered fuel continuities that can endanger fire-intolerant native species. Non-native grasses and forbs can form monocultures across the landscape that not only altering vegetation composition, they can promote increased fire size, frequency, and intensity (Geiger and McPherson 2005). Moreover, many invasive species tend to be the first species to recover post-fire, thus increasing their density and coverage. Combined, all these factors result in positive feedback loop, whereby increasing abundance and density of invasive species leads to increased and more intense fire activity, which in turn favors increased abundance of those species and, subsequently, increasingly frequent and larger fires.

Invasive animals, including trespass livestock, impact native vegetation directly through herbivory, increased soil trampling and degradation, and indirectly by dispersing invasive plant seeds into new areas. In addition to impacting native vegetation communities, trespass livestock also compete with wildlife for available forage and water resources. Impacts to the military training mission caused by

invasive livestock include the delay, interruption, and cancellation of live-fire training activities; an increased risk of livestock/vehicle collisions; and fire fueled by the expansion of invasive weeds.

A more detailed list of impacts as well as current and future management objectives for combating invasive plant and animal species is included in Section 7.9, *Wildland Fire Management* and Section 7.11, *Integrated Pest Management Program*.

#### **2.4.4 Remediation Activities**

Since the 2012 INRMP update, there was an investigation of and remediation activities at several former munitions treatment and disposal areas at AUX-6 at BMGR East. Ammunition disposal probably continued there until the early 1970s. There are three Solid Waste Management Units (SWMU) that underwent remediation:

- SWMU 2-1 is the site of a former underground munitions-burning furnace, associated fuel tank, and pipeline. It is located within the infield portion of AUX-6 bounded by the three runways. Munitions residue was removed from the furnace after it had been shut down and allowed to cool.
- SWMU 2-2, located in the southeast portion of AUX-6, was reportedly used for thermal treatment of munitions, including pyrotechnics, cartridge-actuated devices, and 20 mm ammunition.
- SWMU 2-3, also known as the Northwest Open Burn/Open Detonation Area, is located in the northwest portion of AUX-6 near the northernmost apex of the triangle formed by the three runways. Combustible dunnage (largely wood items) and diesel accelerant were used to ignite/burn munitions placed in a trench; resulting explosions scattered shrapnel around the trenches. Open detonation of munitions entailed placing a high-explosive donor on each item followed by detonation; the most commonly used donor charge was C-4 plastic explosive composed of chlorotrimethylene-trinitramine and a plasticizer.

The SWMUs at AUX-6 are subject to the closure requirements of 40 CFR 264 (*Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities*) Subpart G (Closure and Post-Closure). A Hazardous Waste Management Area Post-Closure Permit under the Resource Conservation and Recovery Act (42 U.S.C. 6901 et seq.) has been obtained by Luke AFB from ADEQ for Unit 8 of the Munitions Treatment Range in June 2006. A condition of the Post-Closure Permit required completion of a Resource Conservation and Recovery Act Facility Investigation to determine whether munitions constituent releases require additional corrective measures to formally close SWMUs 2-1 and 2-3. All fieldwork has been completed and a final report is due early 2018. Details of what was uncovered by the investigations and subsequent remediation will be provided in the BMGR INRMP Public Report on Military Use, Environmental Conditions, Resource Management Activity, and Public Access Involvement 2018–2023.

#### **2.4.5 Potential Future Impacts**

To meet the needs of the future, the BMGR must become a fully relevant 5th generation range. The basing of F-35A aircraft at Luke AFB and F-35B at MCAS Yuma will drive short-term and long-term changes. To maximize effectiveness, F-35 operations and training require larger blocks of airspace

for longer periods and more plentiful, sophisticated, and realistic targets and threats. Options to address these needs, which have the potential to affect natural resources, include the expansion of available airspace (requiring either physical expansion of airspace, increased range operating hours, or both), as well as acquisition and placement on the range of more realistic targets, perhaps in previously undisturbed areas.

#### **2.4.6 Natural Resources Needed to Support the Military Mission**

Natural resources required to support the military mission include vast air space and land area for air-to-air and air-to-ground weapons testing and training. Four key attributes of the natural setting and environment of the BMGR are essential to its overall suitability and capacity for supporting tactical aviation and air defense training, aviation tactics development and testing, and other assigned national defense missions. These attributes include

- a location away from most major population areas yet within the effective training flight radius of aircraft at USAF, USMC, ANG, and ARNG installations in Arizona and California;
- the uninhabited and undeveloped expanse of land and overlying airspace necessary to provide either (1) aviation subranges (up to 13) to support multiple, independent training activities simultaneously or (2) large-scale, range-wide exercises;
- year-round flying weather that allows most training activities to be performed efficiently as planned without weather delays or postponements; and
- varied, wide-open terrain that allows development of diverse, tactical air-land combat training scenarios with realistic air-to-ground target simulations generally with minimal modifications aside from constructing or installing tactical simulations, electronic instrumentation, and other range infrastructure.

Although the BMGR provides a particular advantage for preparing military personnel to operate in arid, hot, and otherwise austere environments (e.g., southwest Asia, Middle East), the range has long proven to be useful for training war fighters for air-land combat operations in nearly all global theaters. The key to this capability is the fact that tactical features and emplacements, such as airfields or air defense sites, can be simulated within the expansive BMGR in positions and configurations that realistically replicate diverse air-land warfare environments. In a similar fashion, the BMGR landscape has also readily accommodated the infrastructure requirements of the limited ground-based training and support activities that are conducted at the range.

## 2.5 Impacts from Recreation, Illegal Border Traffic and Deterrence Efforts

Ground disturbance is one of the key factors influencing soil stability and erosion. On a broad scale, the exclusion of certain surface-disturbing activities (e.g., mining, grazing, development, etc.) and limiting areas where military surface use occurs minimize ground disturbance and the associated effects. Decisions implemented by the 2007 INRMP established a designated road system; closed the range to off-road driving except for approved military, resource management, and law enforcement purposes; and established vehicle operating rules. Roads have been posted or otherwise restricted to clearly identify those that are (1) open for administrative (i.e., government) and public use, (2) open only for administrative use, or (3) closed to all users. Public access to the range is granted by permit only and all permitted users are provided with current maps that show the roads and areas that are restricted for administrative use and roads that are open for public use.

Although the designation of the BMGR road system has provided an important tool for controlling and managing roads and vehicle use, off-road driving and the proliferation of new unauthorized vehicle routes have continued. This problem has been compounded by vehicle traffic associated with UDAs and illegal drug smugglers crossing the international border from Mexico and traveling cross-country through the Organ Pipe Cactus NM, Cabeza Prieta NWR, BMGR, and/or the Tohono O'odham Nation.

Although completion of the border barrier fence has reduced illegal cross-border vehicle traffic, it has led to an increase in illegal cross-border foot traffic. In response, BP has expanded its patrolling into new areas where illegal vehicles historically did not travel. Attempts to apprehend and rescue UDAs has resulted in a proliferation of new roads and off-road driving in these new areas.

Cross-border illegal foot traffic has also caused an upsurge in humanitarian aid drops (Figure 2.12). Food, water, clothing, and medical supplies are dropped at areas along UDA foot trails by humanitarian groups as well as nefarious groups intending to directly support illegal drug smuggling activities. Regardless of the intent, this practice has led to increased amounts of litter and trash along the UDA trails, which the military is responsible for cleaning up.



Figure 2.12: Humanitarian aid drops result in waste being left in the desert.

Due to increased illegal foot traffic, BP agents have expanded the use of drag roads as they monitor for UDA foot traffic. Dragging these roads repeatedly over time has contributed to the formation of berms along a majority of the drag roads. In certain places, the road beds have receded below natural grade and, in effect, the berms become small dams that impact the surface flow of water from natural cross road drainages found all across the range (Figure 2.13). These small berm dams are causing surface runoff from small to moderate storm

events to pond on the upstream sides of the roads. As a result, thick stands of vegetation, often composed of invasive species, develop in response to the increased soil moisture. Additionally, since water flow is effectively cut off from surrounding areas, the natural vegetation community declines for some distance along the drier downstream sides of the roads.

The altered surface flows also can increase erosion and create abrupt vertical drops in the surface (head cuts) and generally lead to an increased need for more regular road maintenance. Additionally, repeatedly dragging roads tends to widen the road surface, increasing the area of disturbance associated with roads across the landscape. Evidence of this has been observed at BMGR West. The AUX-II road has been widened considerably from dragging, diverting runoff, and creating new, potentially problematic drainage channels.

Due to the increase in UDA foot traffic, BP has also expanded its network of rescue beacons since 2007. Rescue beacons are solar powered radio call boxes that allow UDAs or other individuals to signal for help when they are lost or endangered by exposure or other environmental hazards. The BP periodically smooths out the area around the rescue beacons by dragging them as they monitor for recent foot traffic. These drag areas were originally intended to be minimal in size, but have been steadily enlarged over time.

To reduce changes in surface drainage and soil erosion from road dragging activities the USAF, USMC, and BP have developed the following SOPs.

- Drag only within the roadbed
- No loading of drag devices with materials to increase drag weight
- Turn-around in designated areas only
- No increase in turn-around area size
- Drags will not be relocated until they are thoroughly cleaned to remove potential invasive species and/or seeds
- Coordination of desired drag before initiating a new one
- BP Wellton and Ajo Stations have adopted supplemental protocols intended to reduce negative impacts of dragging operations on cultural and natural resources



Figure 2.13: Example of berms found adjacent to drag roads.

Additional efforts between the USAF, USMC, and BP to reduce the negative impacts from other sources are listed below.

- Barry M. Goldwater Range Executive Council (BEC) meetings between affected agencies are held six times a year to identify substantive issues, conflicts, or other matters for consideration regarding potential impact upon lands or resources in the BMGR region.

- Regional Road Network Books and Global Positioning System (GPS)/Adobe PDF maps have been created to delineate roads allowed for use in support of the CBP mission.
- All law enforcement agencies are required to complete the Range Access and Safety Training Program.
- CBP Air, Sector and Station Chiefs are required to attend the BMGR orientations.
- BMGR East Small Arms Range can be accessed by CBP for training.
- CBP has access to and use of Gila Bend AFAF facilities, airfield, and all-terrain vehicle storage facilities.
- Airspace access agreements for CBP rotor, fixed wing and Unmanned Aircraft Systems.
- Special operation support is provided to facilitate the BMGR East access.
- CBP radios are routed through the Gila Bend Emergency Coordinate Center to enable direct contact between the military and BP.
- BMGR East has standardized protocols for BP range access and road-dragging activities.

Additional factors contributing to soil erosion and ground disturbance stem from the use of OHVs, sand rails, other recreational vehicles, and unauthorized travel off the public road system. Excessive speeds and caravanning continually over the same routes have contributed to road degradation.

Soil compaction, erosion, and damage to native vegetation resulting from off-road driving can modify the distribution and pattern of overland flow during rain events, reducing available soil moisture for vegetation and causing further erosion by reducing soil cohesion (Brooks and Lair 2009). In addition, soil erosion may directly impact military training activities; instances of high wind speeds in areas where heavy soil erosion has occurred can reduce visibility during training activities as well decrease air quality.

Soil erosion and poor air quality may also negatively affect the health of threatened and endangered species, particularly the desert tortoise, which has experienced population decline due to an airborne virus responsible for an upper respiratory tract disease. While qualitative observations of anthropogenic impacts to soil resources have been noted by range management, there has been no quantitative, data-driven study documenting human and natural impacts to range soil resources, hydrology, overland flow, and air quality.

In the past decade, roads and increasing motor traffic have disturbed the naturally formed desert pavement, resulting in substantial watershed erosion. Currently, many roads are intercepting the natural ephemeral washes (Figure 2.8) and serve as man-made drainage channels for the watershed.

Frequent use of motorized vehicles, particularly on steep slopes, has led to many road surfaces becoming severely incised. Incised roads disrupt the natural moisture regimes required to support woody riparian vegetation downstream of the roads that bisect them. As a result, vegetation types in upper and lower watersheds have become distinctly different as woody riparian vegetation disappears from the lower watersheds. The incised roads also have caused head cuts that extend to the upper watersheds.

**BMGR East**

In an effort to determine the full scope of damage that illegal border crossing and deterrence is having on the landscape, the USAF began a project to monitor drag roads. The purpose of the project is to inform management techniques to prevent increases in erosion and changes to surface hydrology. Road elevations and photo documentation of road conditions are recorded annually and will be compared to



Figure 2.14: Measurements being taken using California rod and auto-level.

document changes in elevation and other characteristics of monitored drag roads. Future analysis could consist of vegetation surveys to compare the vegetation composition adjacent to drag roads and non-drag roads and hydrological studies to determine how drag roads affect surface hydrology.

**BMGR West**

In 2014, the U.S. Geological Survey (USGS) released its final report to quantify disturbances to soils, vegetation, and cultural resources caused by migrant and smuggling traffic, border security, and general recreational vehicle use. The USGS developed an erosion vulnerability model to identify areas prone to soil erosion from these activities by (1) mapping vehicle disturbances, (2) measuring soil compaction, and (3) using GIS and remote sensing to model soil erosion based on factors from the Universal Soil Loss Equation (Villarreal 2014).

The study identified highly disturbed areas vulnerable to soil compaction and detected approximately 6,077 miles of unauthorized off-road tracks. Major disturbance hotspots occur along the U.S.-Mexico border road (Villarreal 2014). Considerable disturbance was also detected along the southern end of El Camino del Diablo Este and areas around Tractor Road and Military Drag (Villarreal 2014). The highest number of repeated disturbances occurred in the southern part of the hazard area, which is off-limits to OHV uses year-round (Villarreal 2014).

The disturbance mapping data and erosion potential models will help the BMGR West managers to quickly identify where off-road vehicle traffic will have the greatest negative impact on soil resources and allow for the designation of critically disturbed areas and restoration sites where off-road driving should be limited or avoided (Villarreal 2014).

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## CHAPTER 3 ENVIRONMENTAL MANAGEMENT SYSTEM

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Both the USAF and USMC utilize a formal, comprehensive Environmental Management System (EMS) framework and its “Plan, Do, Check, Act” cycle to ensure mission success, in accordance with Executive Order (EO) 13693, *Planning for Federal Sustainability in the Next Decade* (EO 2015); Department of Defense Instruction 4715.17, *Environmental Management Systems* (DoD 2017b); and International Standard Office (ISO) 14001:2015, *Environmental Management Systems* (ISO 2015). The EMS guides the establishment, implementation, and maintenance of all environmental programs.

The Natural Resources Programs employ EMS-based processes to achieve compliance with all legal obligations and current policy drivers, effectively managing associated risks, and instilling a culture of continuous improvement. The INRMP serves as an administrative operational control that defines compliance-related activities and processes.

### ***BMGR East***

The 56 FW is assigned to Luke AFB and as such has purview over Luke, the BMGR East, and the Gila Bend AFAF as separate but related installations. The scope of Luke AFB’s EMS includes all the activities, services, and products associated with the operations of the 56 FW and tenants.

The 56 RMO, Environmental Science Management (56 RMO/ESM), along with the 56 FW Civil Engineer Environmental Element effective program management, technical oversight and compliance of all environmental aspects of Gila Bend AFAF and the BMGR East. The 56 RMO manages the natural and cultural resources of Gila Bend AFAF and the BMGR East.

### ***BMGR West***

The USMC Headquarters and Headquarters Squadron enterprise includes MCAS Yuma and the BMGR West. Within the boundaries of MCAS Yuma, there are a number of tenant units. The scope of MCAS Yuma’s EMS includes all the activities, services, and products associated with the operations of the MCAS Yuma and tenants.

The MCAS Yuma Environmental Department provides MCAS Yuma, the BMGR West, and tenants with effective program management, technical oversight, and compliance of all environmental aspects. The RMD manages the natural and cultural resource aspects of the BMGR West.

## CHAPTER 4 GENERAL ROLES AND RESPONSIBILITIES

General roles and responsibilities necessary to implement and support the Natural Resources Program are listed in Table 4.1. Specific natural resources management-related roles and responsibilities are described in appropriate sections of this plan.

Table 4.1: The BMGR roles and responsibilities.

Office/Organization/Job Title (not in order of Hierarchical Responsibility)	Installation Role/Responsibility Description
RMO Director/Commanding Officer	<p>The 56 FW Commander has delegated Range Operating Authority for oversight of all the BMGR East functions to the 56 RMO Director. The 56 RMO Director is the Range Operating Authority for the BMGR East and oversees the management and operational functions, including ESM operations. The MCAS Yuma Commanding Officer oversees the BMGR West Natural Resources Program.</p> <p><b>Roles and Responsibilities</b></p> <ul style="list-style-type: none"> <li>• Approves the INRMP by signature and certifies all INRMP updates.</li> <li>• Ensures that the INRMP is consistent with the use of the range to ensure the preparedness of the Armed Forces.</li> <li>• Controls access to and use of the BMGR's natural resources.</li> <li>• Commits to seeking funding and executing all "must fund" projects and activities within identified timeframe.</li> <li>• Provides appropriate staffing to execute INRMP implementation.</li> </ul>
Air Force Civil Engineer Center Natural Resources Media Manager/Subject Matter Expert/Specialist	Advocates for resources and funding to implement approved INRMPs (BMGR East only).
Installation Natural Resources Manager/Point of Contact	<ul style="list-style-type: none"> <li>• Supports military training by managing the natural resources of the range in accordance with applicable laws, EO, and directives.</li> <li>• Coordinates INRMP updates, revisions, and implementation requirements with applicable federal, state, and tribal government agencies, as well as nongovernmental organizations and parties.</li> </ul>
Installation Unit Environmental Coordinators (UECs); see AFI 32-7001 (USAF 2017a) for role description	Conducts UEC duties as required (BMGR East only).
Installation Wildland Fire Program Manager	BMGR East and West are both in the process of creating Wildland Fire Management Plans (WFMP) that will assign roles/responsibilities in accordance with this INRMP.

Table 4.1: The BMGR roles and responsibilities.

<b>Office/Organization/Job Title (not in order of Hierarchical Responsibility)</b>	<b>Installation Role/Responsibility Description</b>
Pest Manager	<ul style="list-style-type: none"> <li>• Primary point of contact for all range pesticide use.</li> <li>• Assists natural resources staff with the safe, effective, economical, and environmentally acceptable management of pests.</li> </ul>
Range Operating Agency	<ul style="list-style-type: none"> <li>• The 56 RMO is the Range Operating Agency for the BMGR East and oversees the ESM section.</li> <li>• The MCAS Yuma RMD advises the Commanding Officer in order to meet INRMP goals and objectives.</li> </ul>
Conservation Law Enforcement Officer (CLEO)	<ul style="list-style-type: none"> <li>• Enforces natural and cultural resource laws.</li> <li>• Addresses trespass issues.</li> <li>• Assists natural resource personnel with INRMP implementation.</li> <li>• Collects GIS coordinates of invasive species using the GIS Cloud app.</li> </ul>
NEPA/Environmental Impact Analysis Process Manager	Conducts NEPA/Environmental Impact Analysis Process for all installation projects in coordination with the Natural Resources and Environmental Managers.
U.S. Forest Service	Assists the BMGR East with preparation of the Wildland Fire Management Plan.
Arizona Game and Fish Department	<ul style="list-style-type: none"> <li>• Primary jurisdiction over wildlife management, except where pre-empted by federal law.</li> <li>• Provides assistance for INRMP development and implementation through the 2015 Cooperative Agreement (U.S. Army Corps of Engineers and AGFD 2015).</li> <li>• Develops and maintains habitat assessment/evaluation, protection, management, and enhancement projects (e.g., wildlife water catchments, Sonoran pronghorn forage plots).</li> <li>• Conduct a wildlife monitoring across the range.</li> <li>• Manages wildlife predators and recovery of protected species in accordance with the ESA, shared responsibility with the USFWS.</li> <li>• Enforces hunting regulations, issue hunting permits, and establish game limits.</li> <li>• Participating agency on the BEC and IEC.</li> </ul>

Table 4.1: The BMGR roles and responsibilities.

<b>Office/Organization/Job Title (not in order of Hierarchical Responsibility)</b>	<b>Installation Role/Responsibility Description</b>
U.S. Fish and Wildlife Service	<ul style="list-style-type: none"> <li>• Provides assistance for INRMP development and implementation.</li> <li>• Manages recovery of protected species in accordance with the ESA—shared responsibility with the AGFD; leads the Sonoran Pronghorn Recovery Team.</li> <li>• Manages the MBTA and BGEPA.</li> <li>• Participating agency on the BEC and IEC.</li> </ul>

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## CHAPTER 5 TRAINING

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USAF and USMC installation Natural Resource Managers/Points of Contacts and other natural resources support personnel require specific education, training and work experience to adequately perform their jobs. Section 107 of the Sikes Act requires that professionally trained personnel perform the tasks necessary to revise and carry out certain actions required within this INRMP. Specific training and certification may be necessary to maintain a level of competence in relevant areas as installation needs change, or to fulfill a permitting requirement.

Trainings for BMGR natural resource support personnel are listed below.

- All Natural Resource Managers (NRMs) are required to complete *DoD Natural Resources Compliance*.
- All personnel tasked with handling or managing threatened and endangered species should complete *Interagency Consultation for Endangered Species* and/or other ESA related courses.
- Natural resource management personnel shall be encouraged to attain professional registration, certification, or licensing for their related fields and may be allowed to attend appropriate national, regional, and state conferences and training courses.
- CLEOs must receive specialized, professional training on the enforcement of fish, wildlife, and natural resources laws in compliance with the Sikes Act. This training may be obtained by successfully completing the Land Management Police Training course at the Federal Law Enforcement Training Center (<http://www.fletc.gov/>).
- Individuals participating in the capture and handling of sick, injured, or nuisance wildlife should receive appropriate training.
- Personnel supporting the BASH program should receive training in submitting remains to the Smithsonian for identification and flight-line driver training.
- The DoD-supported publications and webinars provide guidance, case studies and other information.

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## CHAPTER 6 RECORDKEEPING AND REPORTING

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### 6.1 Recordkeeping

Records must be maintained to support implementation of the Natural Resources Programs. Specific records are identified in applicable sections of this plan and in referenced documents.

#### ***BMGR East***

The BMGR East maintains required records in accordance with USAF Manual 33-363, *Management of Records* (USAF 2017b). Records are disposed in accordance with USAF Records Information Management System records disposition schedule.

All natural resources-related documentation for the BMGR East is stored and maintained at the 56 RMO office, Building 500 on Luke AFB. Administrative files are stored at the USAF repository at the Gila Bend AFAF. The 56 RMO maintains a GIS server for the BMGR East data, which resides in the 56th Comm Network Communication Center and is on the Non-classified Internet Protocol Router Network (NIPRNet).

#### ***BMGR West***

The BMGR West maintains required records and disposes of records in accordance with Navy Marine Corps Directive 5210.11E, *Marine Corps Records Management Program* (USMC 2006).

All natural resources-related documentation and GIS shapefiles for the BMGR West are stored and maintained at the Range Management Building 151 on MCAS Yuma.

### 6.2 Reporting

#### ***BMGR East***

The BMGR East NRMs are responsible for responding to natural resources-related data calls and reporting requirements. The Natural Resources Manager and supporting Air Force Civil Engineer Center Media Manager and Subject Matter Specialists should refer to the Environmental Reporting Playbook for guidance on execution of data gathering, quality control/quality assurance, and report development.

#### ***BMGR West***

The BMGR West NRMs are required to respond to natural resources-related data calls and reporting requirements per MCO 5090.2A with changes 1-3 (USMC 2013b).

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## CHAPTER 7 NATURAL RESOURCES PROGRAM MANAGEMENT

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There have been no changes in the 17 management elements outlined in the 2012 INRMP. In planning for the next five years, MCAS Yuma and Luke AFB have each developed a preliminary list of proposed action steps for FY 2019–2023. These action steps were identified by considering data acquired through inventory and monitoring activities in the past five years, changes that have occurred in the past five years (as reported in earlier chapters of this INRMP revision), emerging management issues, and input from other agencies with land management or regulatory authority in the BMGR region. The resource management elements, listed below, are detailed in Chapter 10, *Annual Work Plans*.

1. Resource inventory and monitoring
2. Special natural/interest areas
3. Motorized access and non-roaded area management
4. Camping and visitor stay limits
5. Recreation services and use supervision
6. Rock hounding
7. Wood cutting, gathering, and firewood use; and collection of native plants
8. Hunting
9. Recreational (target) shooting
10. Utility/transportation corridors
11. General vegetation, wildlife, wildlife habitat, and wildlife water
12. Special status species
13. Soil and water resources
14. Air resources
15. Visual resources
16. Wildfire management
17. Perimeter land use, encroachment, and regional planning

### 7.1 Fish and Wildlife Management

Existing inventories show that over 200 bird species, more than 60 species of mammals, 10 amphibian species, and over 50 reptile species potentially occur within the combined area of BMGR and the adjacent Cabeza Prieta NWR. Available evidence indicates that the diversity of wildlife species and habitats present in 1941 when the BMGR was established continue to be found within the range today. Moreover, species populations appear to be relatively stable and typical for this portion of the Sonoran Desert. This may be attributed to a number of factors.

- The land is withdrawn for military use, which has excluded or limited other land uses—such as livestock grazing, farming, mining, and intensive off-road vehicle recreation—that could have altered physical and biological systems to a greater extent than that associated

with military training.

- Ecological interconnections between BMGR, two national monuments, and one national wildlife refuge have remained unfragmented and undiminished.
- The primary land use—aviation training—has limited on-the-ground disturbances of soils and vegetation to relatively small and dispersed portions of the range.
- Restrictions and limits on public access and use have left many portions of the range free of disturbances from intensive and concentrated recreation activities.
- The BMGR is far from major metropolitan areas, which minimizes d public- visitation pressure and the effects of prolonged, intensive use.
- As a result of surface drainage patterns on and around the range, its hydrological features are relatively isolated, which protects them from upstream sources of water-borne pollutants, sedimentation, and watershed modifications.

AGFD has management authority for the state’s wildlife, which is held in trust for the citizens of the State of Arizona. This authority applies to the BMGR unless otherwise pre-empted by federal law. AGFD began its management activities at BMGR in the 1950s, when it established water sources for wildlife (see Section 7.5), which the agency still maintains today. AGFD also organizes and conducts bighorn sheep and deer surveys at BMGR every three years, annual call-counts of mourning (*Zenaida macroura*) and white-winged doves (*Z. asiatica*) at Range 3 and ETAC, and Le Conte’s thrasher (*Toxostoma lecontei*) surveys within both the BMGR East and West (frequency described in Tables 10.1, 10.2 for Bird Surveys and General Bird Surveys, respectively). At BMGR West, AGFD also performs annual surveys for the FTHL, speckled rattlesnake (*Crotalus mitchellii*), and bats.

### **BMGR East**

In August 2015, the U.S. Army Corps of Engineers (USACE) Omaha District and AGFD entered into a five-year cooperative agreement to “collect, analyze, and apply environmental and cultural resource data and implement land rehabilitation and maintenance for optimal management of lands under control of the DoD. . . .” (USACE and AGFD 2015). The agreement facilitates AGFD management activities at BMGR East, which typically include conducting wildlife surveys to track population trends, providing recommendations based on survey data for restoring or maintaining populations of resident species, managing wildlife populations at levels appropriate for protecting other BMGR resource values, and enforcing state game laws.

Collaborative efforts with AGFD and other partners include implementing actions to comply with the Sonoran Pronghorn Recovery Plan and conducting a number of other wildlife activities during the FY 2019–2023 timeframe. Recurring surveys are planned for desert tortoise (every 5 years), birds (years 1 and 2), kit fox (*Vulpes macrotis*) (years 1 and 4), and cactus ferruginous pygmy-owl (*Glaucidium brasilianum cactorum*) (bi-annually). Surveys for raptors and bats will occur annually.

In-house staff and partners will continue the ongoing effort to control invasive species to improve wildlife habitat and identify and maintain important wildlife connectivity corridors. Additional habitat enhancements and restoration activities will be undertaken as needed.

A complete list of wildlife surveys and habitat improvement projects planned for the next five years can be found in Table 10.1 *BMGR East 5-Year Work Plan: FY 2019–2023*. Sensitive species monitoring and conservation projects are discussed in detail in Section 7.4 *Management of Threatened and Endangered Species*.

### **BMGR West**

In 2016, the first comprehensive inventory of amphibians, reptiles, and small mammals was initiated at BMGR West. This project will last for three years, concluding in 2018, to accomplish three objectives: (1) create maps indicating species distribution, (2) identify an efficient, repeatable monitoring methodology, and (3) develop recommendations for monitoring and managing wildlife species.

Additional wildlife surveys and habitat improvement projects planned for the next five years can be found in the *BMGR West Five-Year Work Plan* (Chapter 10 *Annual Work Plans*, Table 10.2). Management actions for threatened and endangered species are discussed in more detail in relevant subsections of Section 7.4 *Management of Threatened and Endangered Species*.

#### **7.1.1 Camera Trapping**

Beginning in 2008, camera trapping has been used extensively on both BMGR East and West. Camera traps are set up to quantify wildlife use of various water development types in specific surroundings. Camera traps are deployed at both artificial catchments and modified tinajas within 20 feet of sites where animals would come to drink. Trapping sites are typically visited once a month to inspect equipment for operability, replace batteries, and download data. These data aid in understanding the variety of species usage, wildlife behaviors, and population sizes. The data also may be used to assess wildlife occupancy by vegetation type, elevation, and structure type (e.g., artificial structure or modified *tinaja*), and whether or not wildlife usage differs near military targets.

Camera traps also record the use of wildlife watering sites by trespass livestock and UDAs; just one catchment camera recorded over 60 UDA visits in 2012 alone. The cameras have captured UDAs drinking from the waters and tampering with tank float valves, dismantling and stealing cameras, disturbing wildlife, and leaving garbage around catchments. UDA and trespass livestock use of wildlife watering sites also increases the amount and frequency of water that must be hauled in by AGFD.

## **7.2 Outdoor Recreation and Public Access to Natural Resources**

BMGR offers a variety of public recreation activities as well as access to natural areas. Approximately 38 percent of the range is open to the public (Figure 7.1). Permitted activities include camping, hiking, hunting, and target shooting. Range permits allow entry to both the BMGR East and West public areas, Cabeza Prieta NWR, and the Sonoran Desert NM. Range access permits are available online or can be obtained from the 56 RMO/Public Affairs office, MCAS Yuma Pass and Identification Office, Cabeza Prieta NWR, and the BLM Phoenix Field office. All visitors are required to sign a hold-harmless form and watch a range safety video. Two permits are required: one to be kept in personal possession at all times and the other to be displayed on the vehicle's dash. Prior to entering the range, recreational

users must call the phone number listed on the back of the permit to hear warning information for specific travel areas. Individuals under the age of 18 must be accompanied by an adult at all times. Any person entering the range without a valid permit may be fined and/or barred from the BMGR.

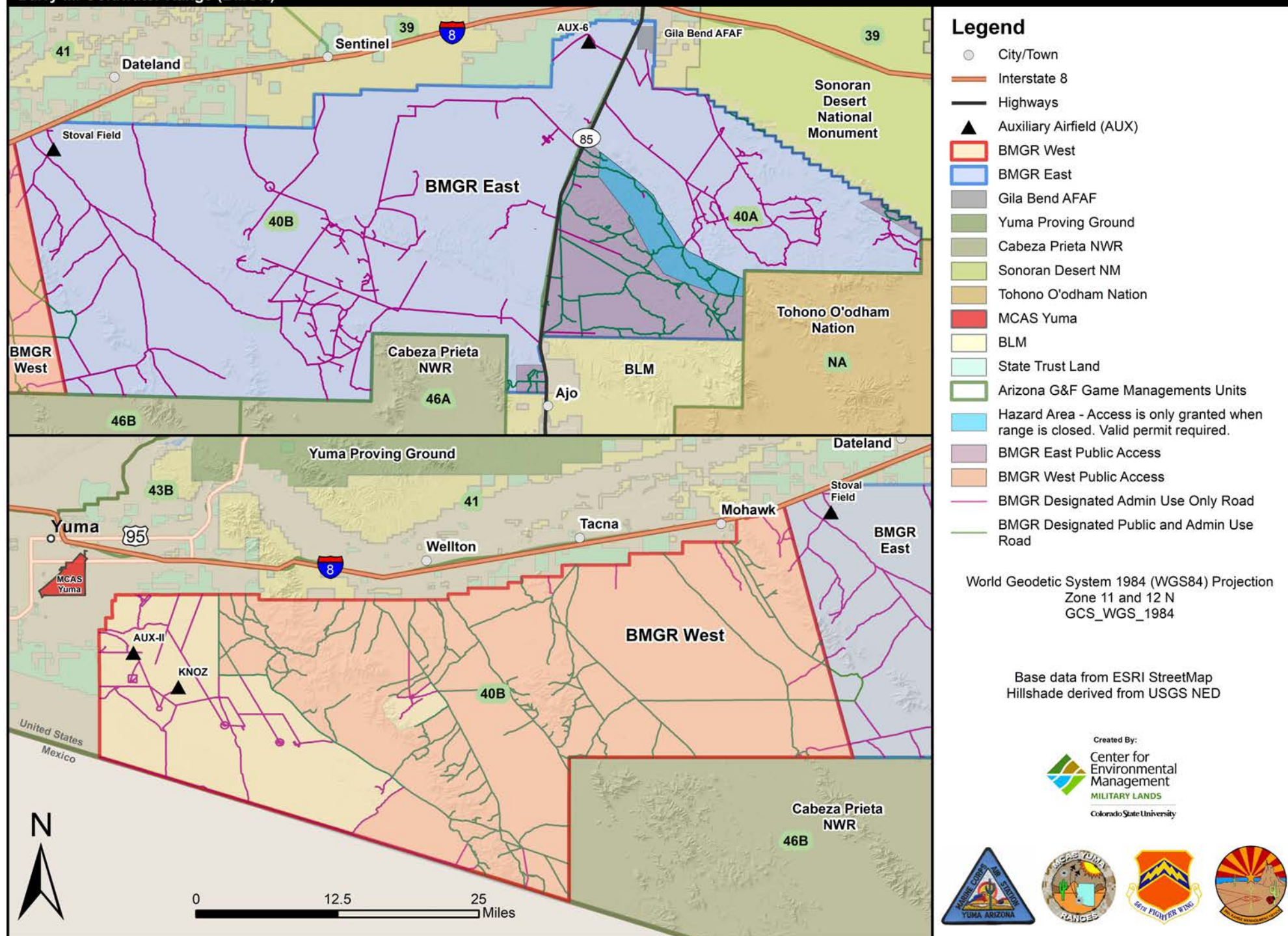
BMGR East is also planning to provide permits online via the iSportsman program (<https://isportsman.net>). The program allows visitors to register and print a permit, sign a digital hold-harmless form, watch the range safety video, and check in and out of an area via smartphone app or a phone call. Additionally, the 56 RMO can develop a custom report that all users must fill out to detail which area of the range they will be visiting, the duration of the visit, type of activities to be conducted, and any other information that will assist the 56 RMO with carrying out its natural and cultural resources management mission. Depending on the success of this program, the MCAS Yuma RMD is interested in using the iSportsman program for BMGR West.

Individuals interested in conducting scientific research at BMGR are required to obtain permission from the 56 RMO or the MCAS Yuma RMD. For collecting wildlife specimens, a Scientific Collection Permit application is also required and must be approved by AGFD.

Figure 7.1: BMGR Public Recreation

Barry M. Goldwater Range (BMGR)

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The following activities are prohibited or the applicant must pass a background check to obtain a Special Use Permit for the activity.

- Use of drones/unmanned aerial vehicles (prohibited)
- Parties with 10 or more vehicles
- Discharge of firearms before sunrise or after sunset
- Discharge of fully automatic firearms
- Extended camping
- Scientific studies of any type
- Collecting wildlife specimens (requires additional approval by AGFD)

All public recreational users of the range are expected to comply with range rules. Cross-country and off-road travel is strictly prohibited—all vehicles are required to remain on designated roads. At Cabeza Prieta NWR, vehicles are restricted to the Camino del Diablo and Christmas Pass Roads. In general, roads are to be considered closed unless designated open by an official carsonite marker post (at BMGR East) or a 4-foot wide by 4-foot high, lettered/numbered, wooden intersection marker (at BMGR West). Disturbance or removal of cultural resources/artifacts (e.g., pottery, chipped stone, ground stone, shell, beads, glass bottles, ceramics, cans, metal, lumber, pictographs, and arrowheads) is strictly prohibited.

In the past, visitor gates at BMGR East have been augmented with counters and cameras, and this may be re-implemented in the future. Cameras can capture images of who is using the range and for what purpose. The practice of leaving food, water, clothes, and medical supplies along UDA foot trails has led to increased litter and trash, which the military is responsible for cleaning up. If identified, such groups will be escorted off the range, have their permits revoked, and may face investigation and prosecution from BMGR East and West CLEOs and BP.

### ***BMGR East***

Approximately 13 percent of BMGR East is open for public recreation (Figure 7.1). Visitors to the BMGR East must abide by these range-specific rules.

- *Rock hounding/Prospecting*—Removal or disturbance of sand, gravel, rocks, minerals, and fossils is strictly prohibited.
- *Hazard Areas*—For safety reasons, the 56 RMO has established “Hazard Areas” that are off-limits to permit holders when the range is open. This restriction affects access to the northernmost portions of Area B.
- *Hunting*—Hunting is restricted to public access areas. Public access areas east of SR 85 fall under the AGFD hunting Unit 40A (AGFD 2017b). Species that may be hunted within this area include bighorn sheep, javelina, deer, dove, and quail. The number of bighorn sheep permits made available have varied over the last 10 years due to population fluctuations. Between 2008 and 2013, no bighorn sheep permits were available due to population decline, and in 2014 only one permit was available. Another slight increase in population size since 2015 resulted in two permits being available each year for 2015, 2016, and 2017.

The number of bighorn sheep permits is determined by results of population surveys conducted by AGFD. Public access areas west of SR 85 on BMGR East (i.e., area near Ajo) and the hunting unit in BMGR West are all part of the same AGFD hunting unit: 40B (as described below under BMGR West).

### **BMGR West**

Approximately 75 percent of the BMGR West is open for public recreation (Figure 7.1). Visitors to the BMGR West must abide by these range-specific rules.

- *Rock hounding*—Surface-rock collection is allowed in most of the BMGR West public recreation areas. Collection is limited to 25 pounds of surface rock per day and 250 pounds per year. The use of metal detectors is strictly prohibited.
- *Hunting*—Hunting within the publicly accessible portions of the BMGR West falls under the AGFD hunting Unit 40B (AGFD 2017b). Species that may be hunted within this unit include bighorn sheep, javelina, deer, dove, quail, waterfowl, and pheasant, although the presence of waterfowl and pheasants is extremely unlikely. As with BMGR East, the number of bighorn sheep permits made available has varied over the last 10 years due to population fluctuations. Currently, 8 bighorn sheep permits are available annually with four tags being issued for the Gila Mountains, two tags for the Tinajas Mountains, and two tags issued for the Copper and Mohawk Mountains. The number of bighorn sheep permits to be made available is assessed annually and is based on results of population surveys conducted by AGFD.

## **7.3 Conservation Law Enforcement**

Law enforcement on the range is defined within the Sikes Act; Assimilative Crimes Act, 18 U.S.C. § 13; Uniform Code of Military Justice, 10 U.S.C. § 807(b); and other applicable laws and regulations. The Sikes Act mandates each military department to ensure that sufficient numbers of professionally trained CLEOs are available and assigned responsibility to perform tasks to implement INRMPs. Enforcement of natural resource laws is a fundamental part of a Natural Resources Program and shall be coordinated under the direction of the Natural Resources Manager (Code of Federal Regulations Title 32, National Defense, as revised in 2018). Because the ICRMP is incorporated (i.e., referenced as appropriate) into the INRMP, the USAF and USMC also must enforce laws and regulations that protect cultural resources.

In addition to conducting enforcement activities, CLEOs serve as the eyes and ears of the range. CLEOs assist with conservation activities such as wildlife surveys, habitat restoration, water projects, formulating hunting objectives, monitoring protected species, and resolving nuisance and human/wildlife conflicts. CLEOs patrol and/or conduct surveillance where there is a potential for poaching or cultural resource vandalism. CLEOs also play a role in slowing the spread of invasive species, as they spend a majority of their time patrolling the range and may be the first to identify such species. They assist NRMs by using the GIS Cloud app to record the GPS coordinates and capture images of invasive species to facilitate prompt management actions.

Integral to resource protection is public education and outreach. Education is a key element in preventative law enforcement. Successful conservation law enforcement is enhanced by the knowledge gained in contributing to natural and cultural resources program support.

### ***BMGR East***

The 56 RMO has entered into a contractual agreement with AGFD to employ two Department Wildlife Managers as CLEOs for the BMGR East. These activities are authorized under Arizona Revised Statutes, Title 17-201A, 211E, 231B.7, and 310 (Arizona State Legislature 2018) and are consistent with provisions of the Sikes Act and the MLWA. One CLEO began service in Oct 2017 and the other will begin service in the fall of 2018. The CLEOs are tasked with enforcing federal and state laws and AGFD Commission rules governing natural resources, cultural resources, off-highway and all-terrain vehicle use, trespass, and property damage as necessary. The CLEOs have authority to conduct investigations and issue citations, serve warrants, make arrests, coordinate case prosecution with County Attorneys and the 56 FW Staff Judge Advocate, and provide testimony in court. The CLEOs will support the military and conservation goals through implementation of the INRMP and ICRMP, as requested/directed by the 56 RMO.

### ***BMGR West***

MCAS Yuma employs four full-time Range Wardens (CLEOs) to investigate, apprehend, and/or detain individuals suspected of breaking the laws and regulations that pertain to MCAS Yuma, BMGR West, and the Chocolate Mountain Aerial Gunnery Range, with an emphasis on protecting natural resources. CLEOs are uniformed law enforcement officers with fully delegated law enforcement authority, including authority as USFWS Deputy Game Wardens, allowing them to enforce federal wildlife statutes (MCAS Yuma 2013c).

## **7.4 Management of Threatened and Endangered Species**

### **Applicability Statement**

This section applies to USAF installations that provide suitable habitat and where sensitive species are known to occur. This section **IS** applicable to Luke AFB, AUX-1, and Fort Tuthill.

#### **7.4.1 Sonoran Pronghorn**

The Sonoran pronghorn has been listed as a federally endangered species since 1967. Whereas methods and geographic study areas used to estimate the Sonoran pronghorn population have varied over time, estimates from 1925 through 1991 indicate that relatively low numbers of pronghorn (approximately 50–150 animals) were present in southwestern Arizona during that time. Sonoran pronghorn, however, were more abundant prior to European settlement (USFWS 2016). The area of pronghorn distribution has become smaller over the years as a result of habitat loss and fragmentation (USFWS 2016). However, the methods and geographic study areas used to estimate the pronghorn population have also varied over time. In 1992, AGFD initiated regular biennial aerial surveys of the Sonoran pronghorn population. Based on these surveys, the U.S. population peaked at an estimated 282 animals in 1994, and the population low was estimated at 21 to 33 animals in 2002 after a severe drought.

The pronghorn's current range includes portions of BMGR East (Figure 7.3) and BMGR West (Figure 7.4). The USAF and USMC actively participate in and financially support the Sonoran Pronghorn Recovery Plan and the actions of the Sonoran Pronghorn Recovery Team. Led by the USFWS, the recovery team generally consists of representatives from the Luke AFB, MCAS Yuma, AGFD, NPS (from Organ Pipe Cactus NM), BLM (from the Lower Sonoran Field Office), ASU, UA, Commission for Ecology and Sustainable Development of the State of Sonora (Mexico), National Commission for Protected Natural Areas (Mexico), Phoenix and Los Angeles Zoos, Customs and Border Protection, and the Tohono O'odham Nation (membership changes occasionally when staff turnover occurs).

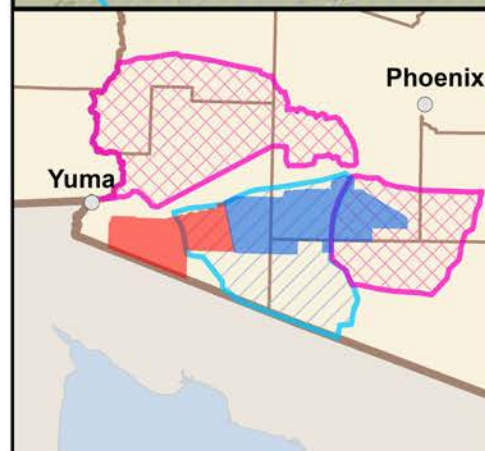
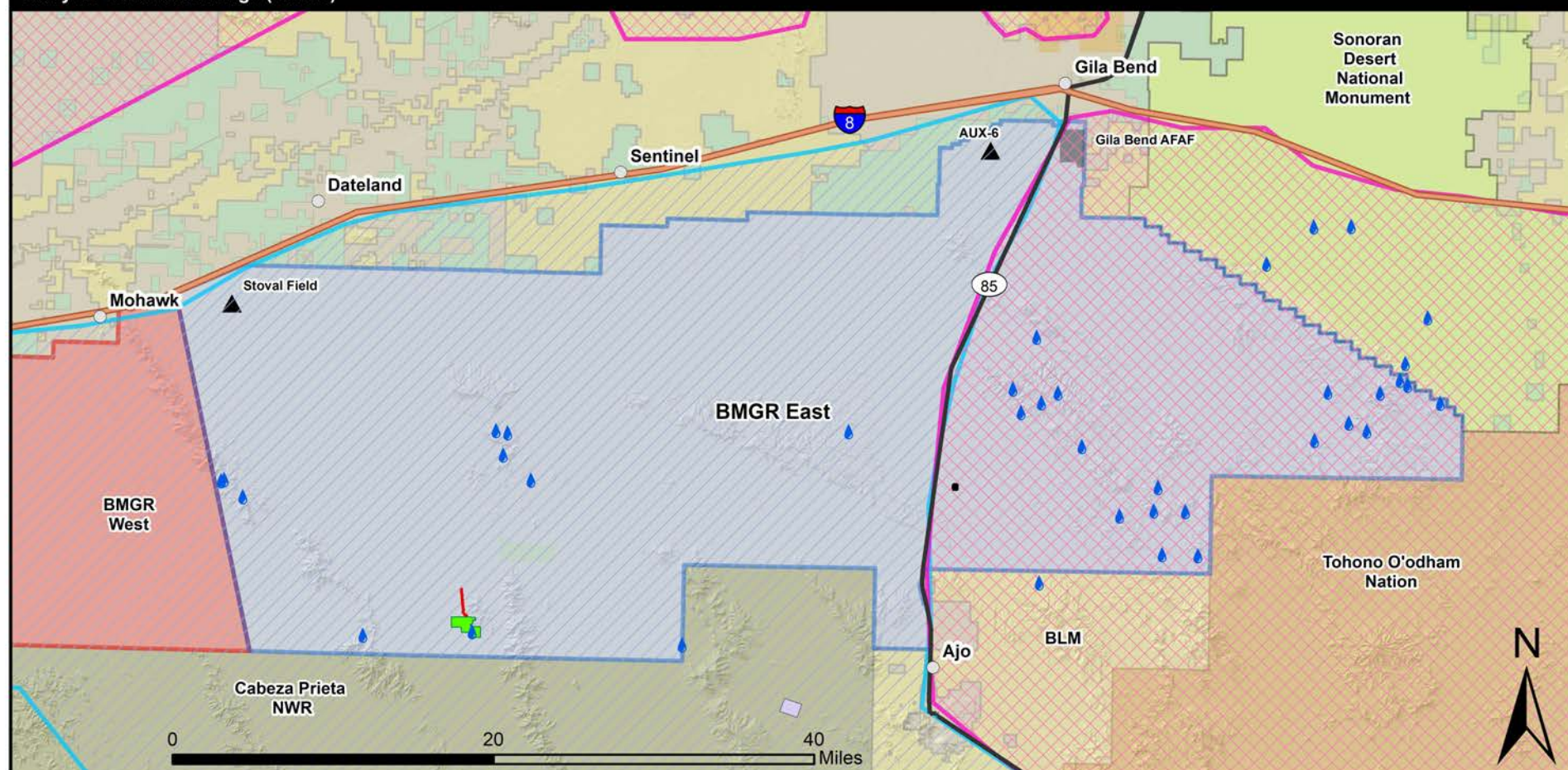
Concerted efforts of the USAF, USMC, AGFD, USFWS, and other members of the recovery team have resulted in improved status of Sonoran pronghorn through the implementation of numerous recovery actions. Key actions have included the initiation of the semi-captive breeding programs at the Cabeza Prieta NWR (2003) and later at Kofa NWR (2011), and the establishment of two nonessential experimental populations, as allowed by Section 10(j) of the ESA, one centered at Kofa NWR and the other centered on Area B of BMGR East. A nonessential experimental population is a special designation that the USFWS can apply to a population of a threatened or endangered species prior to reestablishing it in an unoccupied portion of its former range.



Figure 7.2: Sonoran pronghorn fawns are being raised in the captive-breeding pen that was built at Cabeza Prieta NWR in 2003.

**Figure 7.3: Protected Species Management BMGR East**  
Barry M. Goldwater Range (BMGR)

2018-2023 Integrated Natural Resource Management Plan (INRMP)



### Legend

- |                         |  |  |
|-------------------------|--|--|
| ● City/Town             | BLM  | ■ Sonoran Pronghorn 10(j) Re-establishment Areas |
| — Interstate 8          | State Trust Land   | ■ Endangered Sonoran Pronghorn US Range          |
| — State Route 85        | Sonoran Pronghorn Semi-Captive Breeding Enclosure at Cabeza Prieta NWR | ▲ Auxiliary Airfield (AUX)                       |
| ■ BMGR East             |  | ● Arizona G&F Wildlife Waters                    |
| ■ BMGR West             | Sonoran Pronghorn Granite Mtn Forage Plot Current                      |  |
| ■ Gila Bend AFAF        | Sonoran Pronghorn Granite Mtn Forage Plot Future Expansion             |  |
| ■ Cabeza Prieta NWR     | Sonoran Pronghorn Area B Recovery Pen                                  |  |
| ■ Sonoran Desert NM     |  |  |
| ■ Tohono O'odham Nation |  |  |

World Geodetic System  
1984 (WGS84) Projection  
Zone 12 N  
GCS\_WGS\_1984

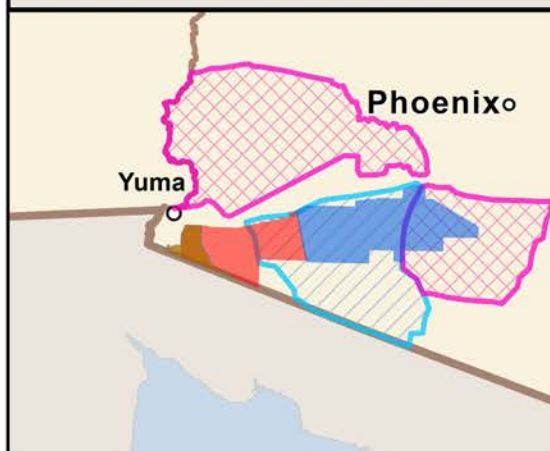
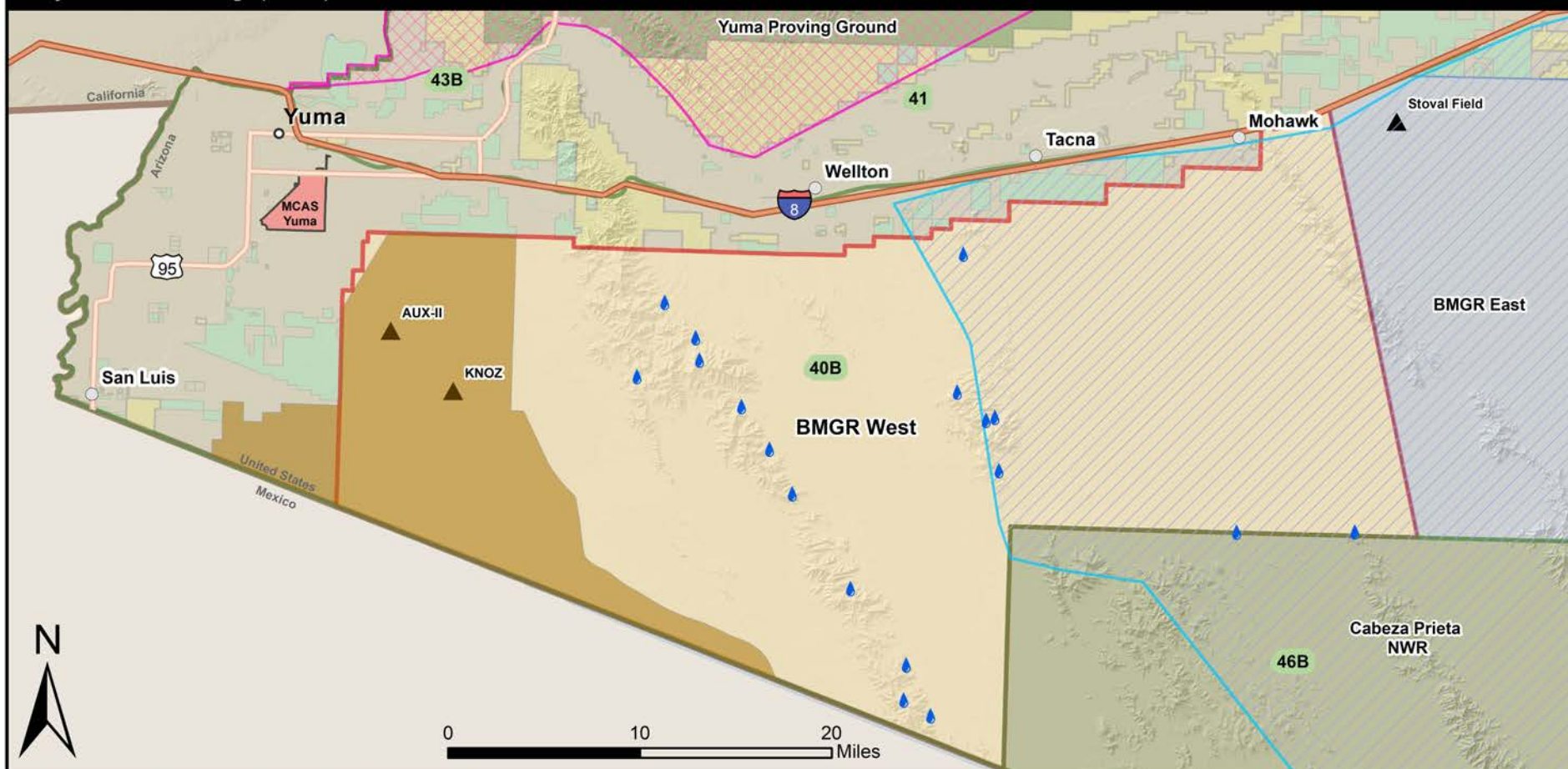
Base data from  
ESRI StreetMap  
Hillshade derived  
from USGS NED

Created By:  
Center for  
Environmental  
Management  
MILITARY LANDS  
Colorado State University



**Figure 7.4: Protected Species Management BMGR West**  
Barry M. Goldwater Range (BMGR)

2018-2023 Integrated Natural Resource Management Plan (INRMP)



### Legend

- City/Town
- Interstates
- Highways
- MCAS Yuma
- BMGR East
- BMGR West
- Yuma Proving Ground
- Cabeza Prieta NWR
- BLM
- State Trust Land
- Flat-Tail Horned Lizard Habitat Area
- Sonoran Pronghorn 10(j) Re-establishment Areas
- Endangered Sonoran Pronghorn US Range
- Arizona G&F Game Managements Units
- ▲ Auxiliary Airfield (AUX)
- Arizona G&F Wildlife Waters

World Geodetic System  
1984 (WGS84) Projection  
Zone 11 N  
GCS\_WGS\_1984

Base data from ESRI StreetMap  
Hillshade derived from USGS NED

Created By:  
Center for  
Environmental  
Management  
MILITARY LANDS  
Colorado State University



These and other actions of the recovery plan, if successful, will ultimately lead to downlisting and delisting of the species. However, the increased numbers of animals on the range has the potential to constrain BMGR's mission. The USFWS continues to work with the military to reduce mission constraints and minimize risks to pronghorn from military operations. For example, in 2010, the USFWS issued a non-jeopardy biological opinion that allowed for reduced target-closure distances, as described below. Additionally, the USFWS has provided the pronghorn with food and water near the range boundaries (east, west, and south) to lure the animals away from actively used targets.

To reduce potential impacts to pronghorn due to military exercises (e.g., ordnance delivery) at BMGR East, daily monitoring of target areas occurs on NTAC, STAC and Range 1 when EOD operations or weapons employment is expected. Monitoring is conducted by qualified biologists and includes visual observations from vantage points with the aid of binoculars and spotting scopes, as well as telemetry surveillance to locate pronghorn.

Per the proposed action in the 2010 biological opinion, if a pronghorn is sighted within a 3.1-mile radius of high explosive ordnance targets, on either NTAC or STAC, then the training mission will be canceled or diverted to a different tactical range (USFWS 2010b). Additionally, no ordnance deliveries of any kind (e.g., inert ordnance) would be authorized within a 1.9-mile radius of the pronghorn location on the tactical ranges for the remainder of the day. On Range 1, strafe activities will be suspended for the day if a pronghorn is located within a 1.9-mile radius of a target and no ordnance of any type will be released if a pronghorn is within a 0.6-mile radius of a target. If a vehicle is within a 1.5-mile radius from a pronghorn, a reduced speed is required (15 mph).

Additionally, several pronghorn watering sites, irrigated forage plots, and supplemental feed stations have been established to help pronghorn populations survive the dry Southwest summers. The goal is to conserve and protect the Sonoran pronghorn and its habitat so that its long-term survival is secured and it can be removed from the list of threatened and endangered species. Specific recovery goal objectives are listed below.

- Ensure multiple viable populations of Sonoran pronghorn range-wide.
- Ensure that there are adequate quantity, quality, and connectivity of Sonoran pronghorn habitat to support their populations.
- Minimize and mitigate the effects of human disturbance on Sonoran pronghorn.
- Identify and address priority monitoring needs.
- Identify and conduct priority research.
- Maintain existing partnerships and develop new partnerships to support Sonoran pronghorn recovery.
- Secure adequate funding to implement recovery actions for Sonoran pronghorn.
- Practice adaptive management in which recovery is monitored and recovery tasks are revised by the USFWS in coordination with the Recovery Team as new information becomes available.

The Sonoran pronghorn recovery efforts are a great success story for endangered species management. Although breeding pen populations fluctuate every year due to fawn recruitment and

pronghorn relocation, biennial population surveys of the wild populations last conducted by AGFD in December of 2016 estimated 228 individuals in the endangered population, referred to as the Cabeza population. As of Fall 2017, informal surveys resulted in estimates of about 70 individuals in the Kofa population (Christa Weise, USFWS, personal communication, December 2017) and 40 individuals in Area B (or Saucedo) populations.

AGFD distributes a monthly Sonoran pronghorn update, which summarizes the captive breeding program, wild pronghorn numbers, water projects, forage enhancements, and related projects. The updates cover the entire U.S. pronghorn distribution, with certain aspects pertaining to the BMGR.

#### **7.4.2 Desert Tortoise**

In 2015, a Candidate Conservation Agreement for the Sonoran desert tortoise was developed as a collaborative and cooperative effort between land and resource management agencies, including the BMGR managing agencies (USAF and USMC). The key effort of the conservation strategy is to focus on conservation, habitat improvement, and ongoing management of the tortoise status and habitat. Some of the key actions implemented by the BMGR East to protect the tortoise are listed below.

- Public access is only allowed by permit in certain areas and visitors (recreational users) are required to watch a safety video that includes natural resource conservation practices.
- All recreational vehicular travel is restricted to designated roads.
- Off-road travel by official vehicles is highly restricted, with extreme exceptions for activities such as clearance of unexploded ordnance.
- Designated speed limits are established for all roads.
- A Fire Management Plan was developed to reduce the potential for wildland fires, which are detrimental to Sonoran desert tortoise habitat.
- An invasive weed monitoring and eradication program is followed, with the aim of protecting native desert habitat.
- Livestock and livestock grazing leases are not permitted and trespass livestock are being prioritized for removal.
- Mining leases and any associated activities are not permitted at BMGR.

In 2012, a landscape-level habitat model was developed to identify locations where desert tortoise occupancy is most likely (Grandmaison et al. 2012). This knowledge, coupled with training maps, will allow range managers to identify specific locations where training and habitat overlap, and to take appropriate measures to reduce conflict to ensure their continued coexistence and compatibility with the military mission (Grandmaison et al. 2012). The model also serves as a valuable tool for prioritizing new areas to survey, including the Growler and Crater mountains, where there is a relatively high probability of tortoise occupancy (Grandmaison et al. 2012). The BMGR East 5-Year Work Plan includes surveying new areas and/or re-surveying known occupied and suitable habitat every five years, focused by model results.

### 7.4.3 Bats

To detect roost site locations and avoid potential conflicts between bats and the BMGR mission, several large-scale bat monitoring studies have occurred or are being implemented. A combination of survey methods are being used, including but not limited to acoustic monitoring, capture (i.e., mist netting), roost assessments, and guano sampling (Figure 7.6).

To better understand bat fauna at BMGR East, a large-scale monitoring study was implemented using a combination of roost, capture, and acoustic surveys (Mixan et al. 2016). By assessing bat diversity and habitat-use patterns, land managers will be able to better identify and address any potential population and range declines in bat species and act to mitigate or reverse those declines. A total of 17 species were identified in the survey (Table 7.1), including four species of concern: the cave myotis (*Myotis velifer*), California leaf-nosed bat (*Macrotus californicus*), greater mastiff bat (*Eumops perotis*), and Townsend's big-eared bat (*Corynorhinus townsendii*).

From 2012–2014, a study was implemented to identify and avoid potential conflicts between bats and the military mission at BMGR East and West and at the nearby Yuma Proving Ground (Piorkowski et al. 2014). New data were collected and combined with data from previous studies, to identify potential bat roosts sites. It was determined that there is relatively little area across the BMGR where bats can rest, hibernate, and rear young. The loss of traditional roosts, such as caves, has led to abandoned mines becoming increasingly crucial habitat features for roosting bats. This could create potential conflicts, as many of these abandoned mines exist in areas open for public recreation, where they represent a potential safety hazard. There are a number of methods (such as installing bat gates at mine entrances) that could prevent people from entering these areas while still allowing free passage for roosting bats.



Figure 7.5: Survey techniques use acoustic monitoring, mist netting, and roost assessments to monitor bats at BMGR.

The BMGR is committed to continually monitoring bat populations and evaluating and protecting important bat roost sites. Monitoring techniques that will be employed over the next 5 years—as time and funding allow—include continuing acoustic monitoring at known roost sites as well as re-analyzing old logs of bat calls by using new call detection software. The purpose of re-analyzing old call logs through improved call detection software is to determine whether the original call detection results were correct and whether any additional species may be present at certain roost locations (i.e., lesser long-nosed bats). Other planned monitoring objectives include continued mist netting and guano sampling and analysis. All data and results from these monitoring activities will be shared with partners at the USFWS and AGFD.

Table 7.1: Bat species detected at BMGR.

Common Name	Scientific Name
Big brown bat	<i>Eptesicus fuscus</i>
Brazilian free-tailed bat	<i>Tadarida brasiliensis</i>
California leaf-nosed bat	<i>Macrotus californicus</i>
California myotis	<i>Myotis californicus</i>
Canyon bat	<i>Parastrellus hesperus</i>
Cave myotis	<i>Myotis velifer</i>
Greater mastiff bat	<i>Eumops perotis</i>
Hoary bat	<i>Lasiurus cinereus</i>
Lesser long-nosed bat	<i>Leptonycteris yerbabuenae</i>
Little brown myotis	<i>Myotis lucifugus occultus</i>
Silver-haired bat	<i>Lasionycteris noctivgans</i>
Long-eared myotis	<i>Myotis evotis</i>
Pallid bat	<i>Antrozous pallidus</i>
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>
Western red bat	<i>Lasiurus blossevillei</i>
Western small-footed myotis	<i>Myotis ciliolabrum</i>
Yuma myotis	<i>Myotis yumanensis</i>

#### 7.4.3.1 Lesser Long-Nosed Bat

One lesser long-nosed bat has been detected at BMGR East. The post-delisting monitoring plan for the lesser long-nosed bat includes monitoring for potential roost occupancy and threats, and an assessment of forage availability through phenology and distribution of lesser long-nosed bat forage resources.

To provide data that will complement the lesser long-nosed bat post-delisting monitoring plan, the following activities may be implemented, as appropriate, on lands within the BMGR, as time and funding allow.

1. The USFWS and AGFD will be notified of any roost sites found to be occupied by lesser long-nosed bats through either the ongoing large-scale bat monitoring study (Mixan et al. 2016) or other monitoring actions.
2. The currently occupied lesser long-nosed bat roost will be monitored regularly and the data will be provided to the USFWS and AGFD. Research is encouraged to determine the occupancy and use patterns of this roost by lesser long-nosed bats.
3. In an effort to better understand occupancy and use patterns by the lesser long-nosed bat, a forage phenology monitoring site(s) may be established to track forage resources over time. This effort will follow protocols consistent with the U.S. National Phenology Network's ongoing program to monitor plant phenology across the U.S. The results will be added to the

National Phenology Network system. Conducting forage phenology monitoring at the BMGR depends on time and funding availability.

#### 7.4.4 Flat-Tailed Horned Lizard

BMGR West conducted extensive fieldwork on the FTHL from 2011 to 2014 (Goode and Parker 2015). The purpose of the study was to address two main issues identified by the USFWS and raised in the Biological Opinion: (1) potential impacts of jet noise on hearing and behavior of the FTHL, and (2) potential effects of increased vehicle traffic on roads in the vicinity of the KNOZ (USFWS 2010b). In 2012, a total of 499 FTHLs were removed from the KNOZ footprint. Twenty FTHLs were sent to the San Diego Zoo for a captive breeding program, and the remaining individuals were either translocated to mark-recapture plots or immediately moved to the other side of the exclusion fencing. During the course of the field work, 353 FTHLs were radio-tracked 7,561 times. It was determined that home range characteristics and movement patterns of non-translocated versus translocated lizards differed only in that translocated FTHLs had significantly larger home ranges in the season immediately following translocation. Although the survival rate of translocated FTHLs was lower than that of those that were not translocated, the difference was not statistically significant, and reproductive behavior was witnessed in both translocated and non-translocated individuals.



Figure 7.6: Baseline surveys for the FTHL provide valuable information for management of this species.

Over 22,000 miles were driven on paved roads at BMGR West while surveying for FTHLs. During that period, 412 live and 150 dead FTHLs were observed on the roadways. It was noted that avian predators were significantly more abundant along roads with power poles. Traffic from the KNOZ construction did not appear to have an effect on road mortality of FTHLs.

With funding provided by USMC and the Bureau of Reclamation, AGFD conducts annual occupancy and demographic surveys within the Yuma Desert Management Area to determine the population size, survival rate, recruitment, and population growth of FTHLs (Grimsley and Leavitt 2015). Approximately 88 percent of the management area is located within the BMGR West and the remainder is owned by the Bureau of Reclamation (Grimsley and Leavitt 2015). In 2008, AGFD established two 22-acre, long-term demography study plots, one within the BMGR West and the other on the Bureau of Reclamation parcel. In 2011, AGFD randomly selected 75 smaller (~328- x 656-foot) occupancy plots, a subsample of which is surveyed annually.

From 2008 to 2014, AGFD has captured 624 individual FTHLs within the two long-term, demography study plots (Grimsley and Leavitt 2015). Of the 624 captures, 316 were juveniles and 308 were adults

(Grimsley and Leavitt 2015). There was a high variability in the number of juveniles captured over the 7-year study period.

From 2011 to 2014, FTHLs were detected during 43 of 82 (52.4 percent) occupancy surveys and in 21 of 29 plots (72 percent) (Grimsley and Leavitt 2015). Of the individuals captured, 21 were male and 22 female (Grimsley and Leavitt 2015).

#### **7.4.5 Acuña Cactus**

In 2013, the acuña cactus was designated as a federally endangered species. It is also protected by the Arizona Native Plant Law and is designated as a highly safeguarded native plant. On 19 September 2016, the USFWS designated critical habitat for the acuña cactus. The critical habitat includes six geographically separate units totaling approximately 18,535 acres. One unit is adjacent to the northeastern portion of the BMGR East; however, lands within the BMGR are exempt from critical habitat designation. At least three distinct clusters of an acuña cactus exist in the BMGR East (Urreiztieta 2013, Abbate 2017). The plant has not been detected in the BMGR West, nor is it expected to occur.

The BMGR East has developed an Inventory and Monitoring Plan, utilizing the same protocols implemented at Organ Pipe Cactus NM, for monitoring the acuña cactus (56 RMO 2007). This protocol is designed to assess population dynamics of the acuña cactus by monitoring growth, mortality, recruitment, and reproductive status of any populations that occur at BMGR East. Currently, the protocol for monitoring the cactus calls for surveying once every five years, beginning in mid-March and continuing once per week for the remainder of the flowering period. Since the recent change in federal status of the acuña cactus, it is likely that the 56 RMO will consult with USFWS to verify that monitoring and conservation actions are appropriate for the species.

Data on locations of individual plants will be used to further define the habitat conditions most suitable to the species, including drained knolls and gravel ridges between major washes and on hilltops in granite substrates. Models of areas with suitable habitat will be used to identify areas to survey and monitor. Data from the monitoring will be compiled into reports on an annual basis, and analyzed to determine trends for the species, which may lead to implementation of adaptive management actions, such as road closures or fire-suppression activities (56 RMO 2007). The annual reports will be shared with the AGFD's Heritage Data Management System, and it is anticipated that there will be annual meetings of all natural resource management agencies to discuss species trends. Additionally, wildlife biologists at the 56 RMO have been communicating with the AGFD to identify possible additional survey locations within the BMGR East.

In addition to conducting surveys of habitat area, other conservation measures will be taken to minimize the potential for disturbance of acuña cactus and its habitat. These actions include monitoring and controlling invasive species; developing and implementing a fire management plan (to include assessing fire risk and maintaining a firefighting agreement with BLM); developing and implementing procedures to control trespass livestock; monitoring illegal immigration, contraband trafficking, and border-related law enforcement; and continuing informal coordination with law enforcement authorities. Controlling invasive species helps to maintain quality habitat and prevent unnatural fire.

Mining and agriculture are prohibited within the BMGR, thus eliminating these threats to acuña cactus. It is believed that the acuña cactus and its habitat are protected from disturbance by the rugged terrain and hilltop locations where it occurs at BMGR.

The USAF agrees to continue its protection of acuña cactus habitat. It will prevent new impacts, such as establishing new military targets and off-road vehicle use, in the proposed critical habitat area; avoid disturbing vegetation and pollinators within 2,952 feet (900 meters) of known or newly discovered acuña cactus plants; and continue to monitor and control invasive plant species. Detailed vegetation mapping will be completed by FY 2019 for BMGR East, and these data might contribute to more precise acuña cactus habitat modeling efforts. Furthermore, when resources are available, the USAF may aid in or enable with ex situ conservation efforts to establish new populations of acuña cactus on BMGR and other areas as appropriate.

Although a recent study has shown that the acuña cactus population at BMGR East has increased by roughly three percent, there are still a number of recommendations that should be followed to ensure its numbers continue to rise (Abbate 2017).

- Continue to monitor acuña cactus populations and morphological measurements for individuals within new populations.
- Monitoring efforts will focus on ridges, hillsides, and gentle slopes where the cacti are most likely to be located.
- Fencing off areas where cactus populations are most vulnerable to being crushed or uprooted due to animal movement and grazing should be considered. Wildlife-friendly fencing should be used and placed to minimize disruption to the movement of native wildlife.
- Initiate seed collection and captive propagation trials.
- Use wildlife game cameras to document predation, potential unknown threats, and seed dispersal mechanisms.
- Future research teams should be limited to two individuals to restrict damage to small acuña cacti, which are vulnerable to crushing and uprooting.

#### **7.4.6 Migratory Birds and Eagles**

##### **7.4.6.1 Migratory Bird and Treaty Act**

The Migratory Bird Treaty Act of 1918 (MBTA) is a federal statute that implements four treaties with the U.S. and Canada, Mexico, Japan, and Russia on the conservation and protection of migratory birds. More than 800 species of birds are protected by the MBTA (50 CFR 10.13). The MTBA prohibits the taking, killing, or possessing of migratory birds unless permitted by regulation. In 2003, the National Defense Authorization Act directed the Secretary of the Interior to exercise their authority under the MBTA to prescribe regulations exempting the Armed Forces from incidental take during military readiness activities authorized by the Secretary of Defense. Effective 30 March 2007, the USFWS issued a Final Rule authorizing the take of migratory birds as a result of military readiness activities, provided such activities do not have a significant adverse effect on the population (USFWS 2007).

Executive Order 13186 (EO 13186) directs agencies to take certain actions to further strengthen migratory bird conservation under the conventions under the MBTA, the Bald and Golden Eagle Protection Act (BGEPA), and other pertinent statutes. It requires the establishment of MOUs between the USFWS and other federal agencies. Accordingly, DoD and USFWS signed an MOU in 2006 to promote the conservation of migratory birds (DoD and USFWS 2006). This MOU, which was updated and re-signed in 2014 (DoD and USFWS 2014), describes specific actions that should be taken by DoD to advance migratory bird conservation; avoid or minimize the take of migratory birds; and ensure that DoD operations, other than military readiness activities, are consistent with the MBTA. Mitigation for species protected under the MBTA in in airspace outside of the range airspace is discussed in section 2.3.4.1 in Volume 2 (Luke AFB INRMP) and Volume 3 (MCAS Yuma Installation Overview) of this document.

From 2012 to 2014, AGFD completed a breeding bird survey. Most species of birds found at the BMGR fall under MBTA protection. MCAS Yuma and Luke AFB have prepared a bird check list that is provided to visitors if requested. The list identifies species that may be sighted; the species list is extensive and is not repeated in this document.

#### **7.4.6.2 Bald and Golden Eagles**

Since the 1990s when the bald eagle was listed under the ESA, pilots of military aircraft flown or managed by the 56 FW observe a 1-nautical-mile lateral separation around bald eagle breeding areas during the breeding season (December 1–July 15), in accordance with measures described in a 1994 biological opinion. Luke AFB also has been a committee member of the Southwestern Bald Eagle Management Committee since at least the 1990s and, in 2007, the 56 FW became an MOU signatory to the Conservation Assessment and Strategy for the Bald Eagle in Arizona.

After the bald eagle was delisted on 28 June 2007 and the 1994 biological opinion was no longer in effect, eagles nonetheless remained protected by the MBTA and the BGEPA. In 2013, the 56 RMO, with technical assistance from USFWS and AGFD, implemented two changes to the avoidance buffers around bald eagle breeding areas. First, the avoidance buffer during the breeding season was changed from 1-nautical-mile of lateral separation to 2,000 feet of lateral and vertical separation. Second, the breeding season is now observed from December 1 to June 30, in accordance with a 2006 Conservation Assessment, which was renewed in 2014. Because the bald eagle breeding window has been found recently at specific locations to extend past June 30 (especially at higher elevations where nesting is initiated later in the spring), further evaluation and information may warrant consideration in altering this window for specific nesting sites.

Less is known about the avoidance measures needed for golden eagles that may be affected by military training activities. This lack of knowledge and updates to the BGEPA have increased the need for golden eagle nest monitoring in the southwestern desert region. In 2011, the Southwestern Golden Eagle Management Committee was formed and the 56 FW became a participant on that committee.

Beginning in 2006, AGFD began to investigate breeding golden eagle statewide distribution and status, which led to an improved understanding and the current ongoing monitoring effort (McCarty et al. 2017). In 2006, AGFD surveyed 85 previously known breeding areas (BAs), finding 14 were

occupied by golden eagles (McCarty et al. 2017). From 2011 to 2014, the Department conducted statewide aerial occupancy and nest survey efforts for cliff-nesting golden eagles (McCarty et al. 2017). Building upon these survey results, the AGFD began assessing productivity at a subsample of known BAs in 2015 and 2016 (McCarty et al. 2017). After the 2017 season, there were 275 known golden eagle BAs, 46 historic BAs, and 474 potential BAs outside of Native American lands in Arizona.

The DOD also contracted with AGFD to design and implement a three-year study (2013–2015) evaluating possible impacts to golden eagles from airborne military training activities and compliance with BGEPA. The study has three primary objectives: (1) identify and survey the potential distribution of golden eagle breeding areas across military lands, (2) create a landscape-scale model to predict the likelihood of potential golden eagle nesting habitat, and (3) collect golden eagle demographic information and provide management recommendations that will permit BMGR and other southwestern military installations to maintain their training regimes while also complying with the BGEPA (Piorkowski et al. 2015).

The following actions were recommended for implementation.

- Continue monitoring known, potential, and historic golden eagle nests on military installations.
- Coordinate with local, state, and regional authorities on current golden eagle distribution and status to inform current and future military activities for compliance with BGEPA.
- Develop avoidance buffers around known golden eagle nests during the breeding season, specifically those that were occupied within the last five years.
- Avoid disturbance around potential and historic golden eagle nests during the early (pre-incubation, incubation, and nests with nestlings <4 weeks of age) breeding season. Potential nest sites are described as those that provide suitable nest-site structure but where no golden eagles have been previously observed. Historic nests are sites that were used by golden eagles in the past, but have had no occupancy for the most recent decade. Normal military training activities can resume in the area once all potential or historic nests have been deemed unoccupied for a given breeding season.
- Avoid heavy ground and aerial disturbance during the early breeding season within habitat predicted by the habitat model as having a high likelihood of being potential golden eagle nesting habitat. By using precise modeling, reducing heavy disturbance activities in areas of high likelihood may reduce or eliminate incidental take even if surveys to document nesting golden eagles have not been completed in those areas. Future model validation should allow quantification of thresholds associated with high likelihood habitat in the modeled estimates.

There is a current effort underway (via contract between USAF and the Colorado State University's Center for Environmental Management of Military Lands) to compile and standardize all historical locations of eagle nests and associated data for a subset of Air Force installations in the western U.S., including Luke AFB and BMGR. All nest locations recorded on installations after project completion should be shared with the AGFD. Likewise, periodically BMGR and Luke AFB will request all eagle nest data recorded by AGFD within the military operating area. The project products will include recommendations for compliance with BGEPA, including monitoring eagle populations, behaviors, and productivity; mitigating disturbance; and assessing the risks associated with overhead utility

infrastructure. Meanwhile, the 56 FW observes the same buffer parameters for golden eagle nests as it does for bald eagle nests (territories occupied within the most recent decade): 2,000 feet of lateral and vertical separation from December 1 to June 30. As new information about sensitive areas is acquired, it will be provided to the 56 RMO Airspace Manager, who updates the GIS layers with the new data, displays all the sensitive species areas on maps, and shares the maps with trainees so that these sensitive areas may be avoided during crucial times and/or seasons.

#### 7.4.7 Monarch Butterfly

Monarch butterfly (*Danaus plexippus*) larvae are obligate consumers of native milkweeds (*Asclepias* spp.); thus, the adults need milkweed plants on which to lay their eggs (Morris et al. 2015). Because no milkweeds grow at BMGR, monarch breeding at the installation is unlikely; however, the low-elevation desert ecosystems at BMGR are part of an important monarch butterfly migration route. A small number of butterflies also overwinter in these habitats during mild winters (Morris et al. 2015). Important habitat-management practices for monarch butterflies at BMGR include any that protect natural migration and overwintering habitats from anthropogenic disturbances. Specific management actions already in place at BMGR are listed below.

- Regulating off-road recreation
- Restricting ground-disturbing activities in focused ground-support areas
- Adhering to NEPA processes for ongoing and new activities
- Limiting development
- Interagency collaboration through the BEC and the IEC
- The presence of four full-time CLEOs who enforce regulations

### 7.5 Water Resources Protection

Surface water availability is so limited at BMGR during certain times of the year that the AGFD began developing wildlife watering sites in the late 1950s. *Playas*, *tinajas*, and other natural water resources, which are important to migratory birds and other wildlife, were often modified to extend the availability of water in them to benefit wildlife. AGFD has constructed catchments at locations across BMGR to collect and store rainfall. Currently, over 40 wildlife watering sites are maintained across the range through a partnership between the 56 RMO, MCAS Yuma RMD, and the AGFD. During periods of extreme drought, AGFD will routinely refill these water sources by hauling in tens of thousands of gallons annually, by both truck and helicopter, to support wildlife species. These sites are also being used and affected by illegal immigrants and drug traffickers (Figure 7.8) across the range.

**BMGR East**

Researchers from Texas Tech University who are conducting amphibian research at BMGR detected elevated levels of ammonium ( $\text{NH}_3$ ) at several wildlife watering sites. This prompted the USGS to evaluate the water quality at a variety of different wildlife watering sites across the BMGR, including natural and modified *tinajas* and artificial water catchments. Sampling began in 2013 and has continued each year since (USGS 2013–2016). The water is tested for a variety of chemical parameters, blue-green algae (cyanobacteria), and chytrid fungus (*Batrachochytrium dendrobatidis*).



Figure 7.7: Camera traps capture wildlife watering sites being used by UDAs.

Results of the water quality analysis have varied over the 4 years of sampling. Ammonia concentrations at a number of sites have occasionally exceeded the Arizona Department of Environmental Quality's acute and/or chronic standards for aquatic life and wildlife (Arizona Department of Environmental Quality 2009; USGS 2013–2016). In 2015, the iron (Fe) concentrations at wildlife watering site 1148 exceeded the EPA-recommended freshwater criterion for aquatic life (USGS 2013–2016). Blue-green algae concentrations were below the detection limits for microcystin, cylindrospermopsin, and saxitoxin. Several wildlife watering sites tested positive for chytrid fungus in 2013, 2014, and 2016 (USGS 2013–2016), although the majority of positive samples were below the detection limit (USGS 2013–2016).

A concern among tribal cultural experts and archaeologists is the modification of natural water sources—*tinajas*—to create more reliable water sources for wildlife (56 RMO 2009). Water has always been a critical resource to desert dwellers and travelers; thus, archaeological evidence is often concentrated around natural water resources. Modifications and ongoing maintenance could result in damage or destruction to these traditionally significant resources.

The tribes would like to have the enhancements and modifications removed and, to the extent possible, have the *tinajas* restored to a natural state. The USAF is working with the tribes and AGFD to remove the structures and has prohibited any alterations of existing structures at *tinajas*. Only construction and remodeling of existing artificial wildlife watering sites is permitted.

Over the next five-year planning period, the BMGR East will continue a holistic review based on previous studies and relevant literature to evaluate the benefits and adverse effects of wildlife

watering sites, continue water quality monitoring, develop recommendations for management and support AGFD annual maintenance and redevelopment of all existing water development as required.

### **BMGR West**

The BMGR West will continue to work with AGFD to monitor and maintain the existing wildlife watering site network over the next five-year period covered by this INRMP.

## **7.6 Wetlands Protection**

There are no jurisdictional wetlands regulated under the USACE, 404 Clean Water Act Program.

## **7.7 Grounds Maintenance**

The BMGR does not support or require ground maintenance activities. Minimal ground maintenance activities do occur at the Gila Bend AFAF, where there are several small turf areas and several rows of planted trees. Gila Bend AFAF is operated and maintained by a USAF Contractor and all ground maintenance activities are completed by the contractor or sub-contractor as part of the service contract agreement. The total area of Gila Bend AFAF is approximately 385 acres with less than 7 acres requiring ground maintenance.

## **7.8 Forest Management**

The entirety of the BMGR lies within the Sonoran Basin and Range Level III Ecoregion. Very few trees are able to survive in this ecosystem given the harsh, hyper-arid (less than 4 inches of precipitation annually) desert climate. No commercial forests occur within the range boundary.

## **7.9 Wildland Fire Management**

Until the early 2000s, wildfires larger than a few acres in size were almost unknown in the Sonoran Desert. The natural fire-rotation interval for portions of the Sonoran Desert, including the BMGR, was estimated to be 274 years (Schmid and Rogers 1988). The low densities of native vegetation typically did not provide sufficient fuel to carry fires over large areas. Sonoran Desert vegetation is typically not fire-tolerant, and large fires within these vegetation communities have the potential to significantly alter vegetation composition at the ecosystem or landscape level. Desert vegetation, such as saguaro cactus, organ pipe cactus (*Stenocereus thurberi*), blue paloverde, ocotillo, and creosote bush are very susceptible to fire and may take decades to re-establish.

The spread of non-native, invasive plants has altered the natural fire regime in some areas. Historically, bare space between shrubs and trees limited the extent that fires could spread in the Sonoran Desert, but changes in climate, human activities, and the resulting spread of invasive species are leading to increased fuel loads, changing fuel characteristics, and putting some fire-intolerant native species at risk. Introduced grasses and forbs increase fuel continuity across the landscape, altering vegetation composition and promoting larger fires and greater fire frequency and intensity (Geiger and McPherson 2005). This, coupled with the tendency of many invasive species to be the first species to recover post-fire (often at greater than pre-fire densities and coverage), leads to a positive feedback loop. Under this scenario, increasing density and cover of invasive species lead to increased fire activity, which in turn favors increased density and cover of those species, which then leads to even greater fire frequency and size. The end result of this potential scenario is a truly altered fire regime and vegetation community across the landscape.



Figure 7.8: Wildfire at BMGR East.

In 2008 or 2009, a wildfire at BMGR West that was evidently fueled by Sahara mustard burned approximately 500 acres of native creosote-bursage community. Post-fire field inventory showed that the mustard was the only species recovering in that area (Malusa 2010), indicating that the vegetation community may be changing over time (which may be driving a change in fire regime). This trend places a priority on continuous invasive species management to protect the quality of the range for native plants and wildlife and to ensure that there will be no impact to the military training activities and mission readiness.

### ***BMGR East***

The 2012 INRMP revision reported a total of 87 wildfires recorded from 2006–2011. All fires were small and typically located within target complexes. Three grass fires along SR 85, likely started by passing vehicles, were each about 1/10 acre in size. It was reported that, in general, invasive plants did not play a critical role in the spread of many of these fires. Wildfires in 2005, however, did burn approximately 132,000 acres of the BMGR East, requiring emergency intervention from the National Interagency Fire Center. The 2005 fire season was considered an anomaly due to the heavy winter rains that lead to increased fuel loading of



Figure 7.9: Fire scar on saguaro cactus at BMGR East.

native vegetation. It is also likely that the spread of invasive species may have contributed to the fuel load available to carry these fires.

Since 2011, there have been 126 fires ranging in size from a few square yards to several hundred acres. These fires are reported to and investigated by the 56 RMO Wildland Fire Program Manager. An account of each incident is reported and stored in the 56 RMO BMGR East Fire History Spreadsheet.

The 56 RMO is working to finalize the WFMP. The plan will define roles and responsibilities and provide guidance for the offices, departments, and agencies involved and will describe pre-fire suppression and suppression actions to be taken on a strategic as well as a tactical basis (56 RMO 2014). The document will serve as the guiding plan for wildfire response protocols. As part of this WFMP development process, the 56 RMO also signed an MOU with the BLM for fire suppression assistance on BMGR East (DOI and USAF 2017).

### ***BMGR West***

There have been very few wildfires at BMGR West. Overall, wildfire risk is much lower at BMGR West than it is at BMGR East, largely due to the difference in precipitation patterns that support only minimal vegetation growth at BMGR West. Even with this lower risk, however, MCAS Yuma is required to develop and implement a WFMP, per MCO 5090.2A with changes 1-3 (USMC 2013b). The WFMP will define roles and responsibilities for offices, departments, and agencies involved in pre-wildfire suppression and suppression activities, and it will provide guidance for firefighters, public safety officials, and the RMD to maximize military training operations prior to and during a wildland fire event. Once the WFMP is complete, the MCAS Yuma RMD intends to develop a MOU with the BLM for fire suppression assistance at BMGR West.

## **7.10 Agricultural Outleasing**

No agricultural outleasing programs at BMGR.

## **7.11 Integrated Pest Management Program**

The Federal Insecticide, Fungicide, and Rodenticide Act of 1996 (FIFRA) provides for federal regulation of pesticide distribution, sale, and use (7 U.S.C. § 136 et seq.). All pesticides distributed or sold in the U.S. must be registered (licensed) by the EPA. Before the EPA may register a pesticide under FIFRA, the applicant must show, among other things, that using the pesticide according to specifications "will not generally cause unreasonable adverse effects on the environment."

FIFRA defines the term "unreasonable adverse effects on the environment" to mean "(1) any unreasonable risk to man or the environment, taking into account the economic, social, and environmental costs and benefits of the use of any pesticide; or (2) a human dietary risk from residues that result from a use of a pesticide in or on any food inconsistent with the standard under section 408 of the Federal Food, Drug, and Cosmetic Act."

Rules, EOs, and regulations applicable to integrated pest management are listed below.

- EO 13751, December 2016, Safeguarding the Nation From the Impacts of Invasive Species (EO 13751 2016)
- EO 11987, May 1977, *Exotic Organisms* (EO 11987 1977)
- DoD Directive 4715.1, February 1996, *Environmental Security* (DoD 1996b)
- DoD Instruction 4715.03, May 1996, *Environmental Conservation Program*
- DoD Regulation 4150.7-P, September 1996, DoD Plan for the Certification of Pesticide Applicators (DoD 1996a)
- AFI 32-1053, of Nov 2014, *Integrated Pest Management Program* (USAF 2014)
- Office of the Chief of Naval Operations Instruction 5090.1B, with changes 1-4, *Environmental and Natural Resources Program Manual* (USN 2003)
- MCO 5090.2A with changes 1–3, August 2013, *Environmental Compliance and Protection Manual* (USMC 2013b)

DoD Directive 4715.1 provides policies and procedures to establish and maintain safe, effective, and environmentally sound integrated pest management programs to prevent or control pests and disease vectors that may adversely impact readiness or military operations by affecting the health of personnel or damaging structures, material, or property. It also ensures that pest management programs achieve, maintain, and monitor compliance with all applicable EOs and Federal, State, and local statutory and regulatory requirements. The pest management programs incorporate sustainable philosophy, strategies, and techniques in all aspects of DoD and contractor vector control and pest management planning, training, and operations, including installation pest management plans and other written guidance to reduce negative effects of pesticides.

### 7.11.1 Invasive Plants

In accordance with the management goals provided by the 2012 BMGR INRMP, vegetation inventory and monitoring plans have been developed and implemented for both the BMGR East (56 RMO 2007) and BMGR West (Villarreal et al. 2011). These plans adopted several protocols from existing regional vegetation monitoring programs, allowing for the integration, collaboration, and sharing of both BMGR East and West monitoring efforts with surrounding land management agencies. As part of these vegetation monitoring efforts, a majority of the range has now been inventoried and mapped according to a standardized approach that has been used across the various adjacent federal lands (USFWS, BLM, and NPS). While the vegetation community mapping is largely complete, inventory and monitoring efforts will continue over the next several years to establish quantifiable trends in vegetation communities over time.

One of the issues that will be identified in the ongoing vegetation inventory and monitoring efforts is how the spread of exotic, invasive, or noxious plants impact native Sonoran Desert vegetation communities. Exotic species, as defined in DoD Instruction 4715.03, are “species that occur in a given place, area, or region as the result of direct or indirect, deliberate or accidental introduction of the species by human activity.” EO 13751 (EO 13751 2016) requires federal agencies to identify actions that may affect invasive species; use relevant programs to prevent introduction of invasive species; detect, respond, and control such species; monitor invasive species populations; provide for

restoration of native species; conduct research on invasive species; and promote public education. An invasive species, as defined in EO 13751, is a “non-native organism whose introduction causes or is likely to cause economic or environmental harm, or harm to human, animal, or plant health (EO 13751 2016)”

Exotic, invasive, or noxious plants are characterized by (1) their ability to easily colonize disturbed areas and (2) specialized dispersal mechanisms that allow them to quickly become the dominant vegetation in an area. These abilities differ between species, but invasive plants generally have the potential to impact native vegetation communities. Roads, livestock, and people, serve as the primary vectors for invasive species at BMGR. The 2007 INRMP reported that the density and distribution of non-native species was not accurately known, although BMGR East was estimated to have a comparatively greater distribution of invasive species than BMGR West due to its greater annual rainfall amounts and closer proximity to vector sources for invasive species. Several studies and mapping efforts have been undertaken since the 2012 INRMP revision to better understand the distribution, density, and life history of invasive species at BMGR (e.g., Li and Malusa 2014; Damery-Weston 2016; also, the BMGR West GIS Cloud Mapping Effort).

### **Sahara mustard (*Brassica tournefortii*)**

Sahara mustard (Figure 7.10) is a cool-season, winter annual herb that flowers early in the year (December–February) with small, dull-yellow flowers that make them inconspicuous compared to most other true mustards (Bossard et al. 2000). A single large plant can produce up to 16,000 seeds. Dried plants tend to break off near the soil surface and then tumble across the landscape like Russian thistle, spreading seeds along the way. According to Bossard et al. (2000), Sahara mustard was first recorded in the late 1920s in the Coachella Valley of California. In 1957, the species was found near Yuma, AZ, and had become widespread by the 1970s. Due to its early growth/flowering phenology, Sahara mustard is able to capitalize on winter soil moisture early in the growing season, allowing the species to largely complete its lifecycle prior to when many native species begin to flower (Bossard et al. 2000).



Figure 7.10: Sahara mustard at BMGR.

Given the species' affinity for sandy soils and its life history, Sahara mustard continues as the most prevalent invasive species at BMGR. The spread of this species is a greater concern at BMGR West because the soils there are generally sandier. Habitat type, species competition, and other biotic and abiotic factors are likely to have a substantial influence on the spread of this species. Sahara mustard tends to produce a dense, highly flammable, monoculture ground cover. As such, it can reduce native plant diversity and increase fire risks. Also, given that Sonoran Desert plant communities are not fire-adapted, greater frequencies of wildfire have potentially devastating results.

### Buffelgrass (*Pennisetum ciliare*, Syn. *Cenchrus ciliaris*)

Listed as a State of Arizona Prohibited and Regulated Noxious Weed (Arizona Administrative Code 3-4-244), buffelgrass (Figure 7.11) is native to the arid and semi-arid regions of East Africa, the Arabian Peninsula, Madagascar, Pakistan, and northern India (Cox et al. 1988). It arrived in Australia in 1880 and in Texas in 1917. The species was first introduced into the U.S., South America, and Mexico as a means to improve productivity of grazing pastures and to provide for erosion control (California Invasive Plant Council 2006). Across the region, buffelgrass is spreading rapidly, and, where it becomes established, it often displaces native vegetation and forms a dense monoculture. Buffelgrass has the potential to alter the natural Sonoran Desert fire regime, further impacting and displacing fire-intolerant communities of native vegetation (McDonald and McPherson 2011; U.S. Forest Service 2014). Buffelgrass is found across the BMGR, and recent research by Whittle and Black (2014) and Damery-Weston (2016) has provided insight into the rate of buffelgrass expansion for areas at BMGR East along SR 85.



Figure 7.11: Buffelgrass outbreak within Area B.

### Fountain Grass (*Pennisetum setaceum*)

Fountain grass (Figure 7.12) is a coarse perennial grass with a densely clumped growth form that can reach five feet in height (Bossard et al. 2000). Originally native to Africa and the Middle East (Williams et al. 1995), fountain grass has been introduced to many areas in the U.S. and other parts of the world due, in part, to its popularity as an ornamental plant (Neal and Senesac 1991; Williams et al. 1995). Its seeds are easily dispersed by vehicles, humans, livestock, wildlife, wind, and water (Cuddihy et al. 1988; Tunison 1992; Bossard et al. 2000). Fountain grass is found in areas on BMGR East and West and, similar to buffelgrass and Sahara mustard, its fire-tolerant nature could lead to altered fire regimes if these species are left unmanaged (California Invasive Plant Council 2006).



Figure 7.12: Fountain grass infestation. Photo courtesy of NPS.

### Mediterranean grass (*Schismus arabicus* and *S. barbatus*)

Mediterranean grass is native to Eurasia (Jackson 1985). The species was introduced into North America, South America, Australia, and the west coast of Europe where Mediterranean climate regimes occur (Bor 1968). In North America, it likely spread westward from Arizona into California

during the early 1900s (Burgess et al. 1991). It was first recorded in California in 1935 (Robbins 1940) and is now well established in the southwestern U.S.

### **Colocynth (*Citrullus colocynthis*)**

Colocynth (Figure 7.13), or desert gourd, is an invasive desert melon that thrives in sandy, arid soils. Its deep tap root provides access to moisture, allowing it to outcompete native vegetation (Burrows and Shaik 2015). Native to the Mediterranean, Middle East, and Asia, colocynth has become widely invasive across portions of Australia (Shaik et al. 2015) and has recently been found in the U.S. within Death Valley National Park (Swearingen 2008). A small population was recently found adjacent to the Range 1 access road at BMGR East in close proximity to an active archeological excavation (Fox 2017). It is believed that colocynth seeds were potentially brought in on excavation equipment being used for the archeological operation. All identified plants and fruits were pulled and disposed of, although there was evidence of broken and partially eaten fruit, indicating seed dispersal may have occurred (Sheri Fox, pers. comm., 2017). The surrounding area is now being monitored by the 56 RMO staff to attempt to limit the spread of this new invasive species.



Figure 7.13: Colocynth plants (left), flower (middle), and fruits (right). Photos courtesy of Qatar Natural History Group.

#### **7.11.1.1 Other Invasive Plants**

Other non-native species that have been identified at BMGR include Lehmann lovegrass (*Eragrostis lehmanniana*), salt cedar (*Tamarix ramosissima*), Athel tamarisk (*Tamarix aphylla*), Russian thistle (*Salsola tragus*) and red brome (*Bromus rubens*). If left undetected, unmonitored, and unmanaged, nonnative invasive species could fundamentally alter the BMGR's ecosystem structure through competition with native species, reduction of species diversity, and enhancing the spread of wildfires (Villarreal et al. 2011).

#### **7.11.1.2 Spread of Invasive Plants**

##### **Roads**

Roads have been identified as a major contributor to the spread of invasive plants at BMGR (Figure 7.14), and the proliferation of new roads and subsequent increases in soil disturbance is of particular concern to range managers. Seeds from invasive species can be caught in wheel wells,

undercarriages, and tire treads as vehicles drive through infested areas. As vehicles travel into uninfested areas, seeds may fall out, thereby effectively dispersing invasive species seeds into a new area. Additionally, roads often create favorable germination and growing conditions for invasive species by altering drainage patterns, catching additional water,



Figure 7.14: Buffelgrass infestation along SR 85.

disturbing the soil, and burying the invasive species seeds (particularly when drag road surfaces are smoothed). In recent years, increased activities related to geocaching, BP use, and illegal humanitarian aid drops have led to increased off-road vehicle use in some areas. This increased use has heightened the risk for resource damage and increased the chances for invasive species to spread into new areas. Off-road vehicle use, road closure signage, fencing, informational brochures, and increased CLEO patrolling have been implemented in recent years in hopes of curbing these activities before harsher enforcement actions become necessary.

Another factor influencing the spread of invasive plants over the past ten years is the ground disturbance associated with drag roads and the drag areas around rescue beacons along the southern border fence. A network of rescue beacons has been installed throughout the BMGR in an effort to mitigate UDA injuries and/or fatalities arising from the region's extreme environment. The BP will periodically smooth out the areas around the rescue beacons and along the main roads system to enhance detection of recent UDA foot traffic. These drag areas and roads were originally intended to be minimal in size, but have enlarged over time as dragging has continued (Figure 7.15). Disturbance associated with drag roads and drag areas is of particular concern for the spread of invasive species that thrive in disturbed soils. Range managers at both BMGR East and West continue to monitor these roads and maintain a dialogue with the BP regarding impacts and maintenance of these roads.



Figure 7.15: Sahara mustard along the STAC Range Road.

### **Wildfire**

Wildfires larger than a few acres were almost unknown until the last 15 years because the low densities of native Sonoran Desert vegetation typically do not provide sufficient fuel for carrying a fire over large areas. The spread of invasive plants, however, has substantially raised the threat that wildfire poses to native vegetation and wildlife because the invasive species grow in high densities, will readily carry a wildfire, serve as a ladder fuel into taller stands of native vegetation, and tend to recover from fire more readily than native vegetation. A wildfire that was evidently fueled by Sahara

mustard burned approximately 500 acres of native creosote-bursage community at the BMGR West in 2008 or 2009. Field inventory showed that the mustard was the only species recovering in the area after the fire (Malusa 2010). In addition to degrading the range quality for native plant species and wildlife, wildfires also can interfere with the military training and mission readiness.

### 7.11.1.3 Invasive Plant Management Actions

#### **BMGR East**

There has been an observable expansion of buffelgrass along the SR 85 corridor (Figure 7.16), with the vast majority of this expansion occurring outside of the BMGR fence line along the highway right-of-way. Buffelgrass has also been reported in the STAC, areas within the San Cristobal Valley, and within portions of Area B, south of the Crater Mountains, where it appears to be extending away from the highway along several small drainages. Staff from the 56 RMO have conducted a multiyear study examining and mapping the rate of buffelgrass spread along SR 85. Results from the research suggest that buffelgrass expansion onto the BMGR East is limited to draws and washes, making control efforts feasible (Whittle and Black 2014).



Figure 7.16: Spread of invasive buffelgrass along SR 85 is a growing concern for range managers. Here, 56 RMO staff are monitoring buffelgrass expansion as part of a monitoring and mapping project.

Two other widespread invasive species at BMGR East are Mediterranean grass (*Schismus* spp.) and Sahara mustard. Mediterranean grass is widespread throughout the range and is most common on fine-grained soils. Sahara mustard is most common west of SR 85 and has become well established along many of the NTAC and STAC roadways and within several of the target areas. Both Mediterranean grass and Sahara mustard are annual weeds that appear to be largely dependent on moisture, as they are much more abundant following wet winters.

Luke AFB has developed and implemented an IPMP that includes guidance and protocols for invasive species removal and management for Luke AFB, Gila Bend AFAF, and BMGR East (Luke AFB 2015). This plan outlines the budgeting mechanisms; applicator certification requirements; reporting and recordkeeping requirements; health and safety guidelines; regulatory compliance; herbicide storage mixing, safety, and disposal guidance; and guidance for invasive species removal and control. Methods for control include a combination of physical and mechanical removal as well as the application of herbicide through both foliar spot spraying and aerial application (Figure 7.17). Restricted-use herbicides are not currently approved for use at either Gila Bend AFAF or BMGR East, and only EPA-registered pesticides containing glyphosate as the primary active ingredient are currently being applied at BMGR East. In general, regardless of the manner in which the herbicides

are applied at BMGR East, herbicides will be used in a “judicious and prudent manner using products that quickly degrade and have little risk of contaminating water or affecting wildlife” (Luke AFB 2015).

Physical removal and disposal of invasive plants by hand is prioritized in small (<100 acres), environmentally sensitive areas. Application of herbicide with ground equipment is being conducted in areas with low-density stands of invasive weeds that are accessible by vehicle and foot. Ground-based equipment is also being used for targeted applications in accessible infested areas with high densities of environmentally sensitive species. Aerial application of herbicide is restricted to high-density areas of



Figure 7.17: A USAF C-130 applying herbicide along a roadway at BMGR East.

invasive species. It is typically applied by larger aircraft, which may include a USAF C-130 outfitted for pesticide dispersal. The USAF had an Environmental Assessment in place for a Sahara mustard control program using aerial herbicide application for two years at BMGR East (Finding of No Significant Impact was signed on 19 July 2012; 56 RMO 2012). The purpose of this program was to reduce wildfire risk and improve range quality for wildlife and native vegetation communities on approximately 7,800 acres that had high densities of Sahara mustard and few other environmentally sensitive plant species. This program resulted in improved control of Sahara mustard along approximately 15 linear miles of roadways. In the event that aerial herbicide treatments are required in the future, NEPA documents will be prepared. Additionally, the USAF will be required to re-enter consultation with the USFWS prior to conducting any future aerial treatments within Sonoran pronghorn habitat.

The 56 RMO is initiating a similar invasive species mapping and treatment project at BMGR West (detailed below) using the GIS Cloud app. Currently, funding is in place to begin a partnership with the UA to maintain and manage the GIS Cloud app data and to purchase one smartphone with an annual data plan. This device will be used by MGR East CLEOs to map and monitor invasive species on the east side of the range.

### ***Gila Bend AFAF***

The Gila Bend AFAF serves as an emergency runway and provides the facilities required to support maintenance and operations for both the air field and BMGR East. The air field is operated and maintained by a USAF contractor and all pest management functions are completed by the contractor or sub-contractor, as required under the service contract agreement. Gila Bend AFAF utilizes a comprehensive, integrated pest management approach to weed and pest control that takes into account the various chemical-, physical-, and biological-suppression techniques available and

analyzes the weed's or pest's habitat and its interrelationship within the ecosystem. Pest management activities at Gila Bend AFAF are guided by the Luke AFB IPMP (Luke AFB 2015) and are specifically addressed in Attachment 7 of that document. The IPMP defines the roles, protocols, contracting requirements, reporting protocols, and treatment procedures for weed and pest management activities at Gila Bend AFAF. The plan also discusses regulatory compliance; safety and health protocols; herbicide/pesticide storage, mixing, and disposal procedures; and provides a list of approved herbicide/pesticides for use on the AFAF. Under this plan, restricted-use pesticides are not permitted to be used at the AFAF or BMGR East.

Pest issues at Gila Bend AFAF are primarily related to BASH threat species, including round-tailed ground squirrel (*Spermophilus tereticaudus*), coyote (*Canis latrans*), rock pigeon (*Columba livia*), and a variety of dove species including the mourning dove, white-winged dove, and Eurasian collared-dove (*Streptopelia decaocto*). Weed issues are similar to those found at BMGR East and include Sahara mustard and buffelgrass. All pest management actions at Gila Bend AFAF are recorded and retained within the Integrated Pest Management Information System program.

### **BMGR West**

The MCAS Yuma RMD, in cooperation with the 56 RMO, partnered with researchers from the UA to characterize and model Sahara mustard invasion throughout BMGR. This study combined field measurements, controlled experiments, and mathematical modeling to determine environmental factors that affect Sahara mustard success and long-term impact on other native winter-annual plants. More specifically, this study examined how spatial variation in both biotic and abiotic environments affected the population growth of Sahara mustard as well as its impact on native plants. It also attempted to quantify the natural dispersal range of the invasive species to better estimate the rate of spread across the range.

Results from this research (Li and Malusa 2014, Li 2016) are encouraging, as it seems that Sahara mustard can be effectively controlled because the seedlings are vulnerable to adverse post-germination conditions; on a range-wide scale, after extended periods of winter drought, Sahara mustard source populations are reduced to isolated areas where soils retain moisture. These populations will expand again across the landscape as favorable conditions return. Successful elimination of persistent local populations after droughts can effectively reduce the species' presence over the range. The knowledge gained from this study has provided strong scientific insight for managing Sahara mustard, and led to the development of a management program adopted by the BMGR West RMD to reduce the presence of this species over time.

This management program involves a continuing partnership with the MCAS Yuma RMD, UA, and NPS Lake Mead Exotic Plant Management Team. This project employs cloud-based mapping to document invasive species presence across BMGR West, allowing for targeted follow-up control efforts to be implemented as efficiently as possible. The project is designed to give managers a timely method for mapping and tracking the spread of invasive weeds across the range, with particular focus on Sahara mustard and buffelgrass. This effort is based on cloud-based mapping using the GIS Cloud app and smartphones to quickly and easily gather data on invasive species distribution and abundance. The app records the sighting location and provides dropdown menus for recording the species and estimating its abundance. In addition, there are options to record photos, audio, and take

specific notes for each point. Once completed, these points are automatically uploaded to an online map that makes the data immediately available to UA staff and the Lake Mead Exotic Plant Management Team. The mapping effort is coordinated primarily through Station's four CLEOs using smartphones with the GIS Cloud app. CLEOs from MCAS Yuma are typically the first to discover new invasive species populations and provide key survey data for the project.

As their part of this partnership, UA staff are tasked with data-quality control, interpretation, expert surveys to assess current invasion conditions, maintaining the GIS Cloud app, and prioritizing treatment areas based on real-time distribution of invasive plant emergence and habitat favorability of the invasive species. UA staff also perform before/after surveys of treatment areas and generate reports detailing the success or failure of each treatment effort and analyzing the results of the generated distribution models. Due, in part, to the simplicity and effectiveness of the GIS Cloud app, MCAS Yuma RMD staff, BMGR West CLEOs, and UA staff together collected 1750 data points during the winter of 2016–2017 and over 2,800 data points since the program's inception in 2015.

Upon receipt of data from the GIS Cloud app (Figure 7.18) and treatment recommendations from UA staff, the NPS Lake Mead Exotic Plant Management Team determines and implements the appropriate weed control treatment for each area provided. Treatment options include foliar spot spraying, cut-stump treatments, and manual removal. All herbicide mixture and application practices follow explicit NPS protocols and regulations. In addition, the NPS team purchases, stores, and delivers herbicides to project sites and observes all herbicide label requirements and guidance for each of the planned treatment options. The NPS team also completes and maintains the required MCAS Yuma Pesticide Application records and submits them after each herbicide application project is completed.

Other contributions from the NPS Team include gathering, updating, and providing GIS information on potential areas identified for treatment during the following year; maintaining accurate records of project activities (using GPS/GIS technology), including tracking the amount of herbicide and other chemicals used (i.e., surfactants), areas surveyed, and acres and species treated; and then compiling their work into a final annual report that is electronically submitted to MCAS Yuma RMD within 30 days of project completion. One major benefit of this project is that MCAS Yuma personnel never have to handle or apply any herbicides. Since the GIS Cloud app monitoring and treatment program began in 2015, the NPS team has actively treated five invasive species, including Sahara mustard, buffelgrass, salt cedar, Athel tamarisk, and fountain grass. Accumulatively, 6,739 acres have been surveyed, resulting in the treatment of 11 acres (Table 7.2).

One important outcome of this program is extensive knowledge of the occurrence and abundance of invasive plants, especially Sahara mustard at BMGR West. According to this known distribution of Sahara mustard, BMGR West is subjected to substantial invasion pressure from the species' source populations outside of the range's jurisdiction. Successful control of Sahara mustard requires sufficient interagency collaborations to contain invasive populations at BMGR East, Cabeza Prieta NWR, and other agency land (BLM, Bureau of Reclamation, etc.). The success of the management program has prompted staff at the Cabeza Prieta NWR to adopt the GIS Cloud app to monitor and treat Sahara mustard and buffelgrass on the Refuge. Staff from the 56 RMO at BMGR East will initiate use of the app in spring 2018. In addition, staff from the El Pinacate Preserve in Mexico have

expressed interest in initiating a similar monitoring program. It is desirable to establish an interagency program that can sufficiently standardize the use of the GIS Cloud app across agencies and coordinate treatment efforts among agencies to target source populations that infest areas across jurisdictional boundaries.

Table 7.2: Invasive plant treatment efforts for BMGR West, 2015–2017.

Species	Year	Surveyed Acres <sup>1</sup>	Infested Acres <sup>1</sup>	Gross Infested Acres Treated <sup>1</sup>	Treated Acres <sup>1</sup>
Sahara mustard ( <i>Brassica tournefortii</i> )	2015	1192.00	1.06	62.09	1.06
Buffelgrass ( <i>Pennisetum ciliare</i> )	2015	1192.00	1.25	13.15	1.25
Salt cedar ( <i>Tamarix ramosissima</i> )	2015	1192.00	0.02	0.15	0.02
Athel tamarisk ( <i>Tamarix aphylla</i> )	2015	1192.00	0.00004	0.00005	0.00004
Fountain grass ( <i>Pennisetum setaceum</i> )	2015	1192.00	0.0005	0.003	0.0005
Sahara mustard ( <i>Brassica tournefortii</i> )	2016	3777.29	4.37	538.19	4.37
Buffelgrass ( <i>Pennisetum ciliare</i> )	2016	3777.29	0.08	6.66	0.08
Salt cedar ( <i>Tamarix ramosissima</i> )	2016	3777.29	0.002	0.02	0.002
Sahara mustard ( <i>Brassica tournefortii</i> )	2017	1769.30	4.00	598.11	4.00
Buffelgrass ( <i>Pennisetum ciliare</i> )	2017	1769.30	0.03	5.23	0.03
<b>Total</b>		<b>6739 acres</b>	<b>11 acres</b>	<b>1224 acres</b>	<b>11 acres</b>

<sup>1</sup> Acreage Definitions\*

**Surveyed Area:** Any area covered during the course of weed management / control activities. An area may be considered “surveyed” regardless of the presence / absence of target weed species. Surveyed area is obtained by walking the perimeter or taking perimeter points with a GPS unit, or by digitizing area on a screen using landform references.

**Gross Infested Area:** The gross infested area is defined as the general perimeter of the infestation. Gross infested areas contain the target species and the spaces between populations or individuals. A gross infested area is calculated by adding up the total acreage of all mapped weed infestations, without taking into account percent cover.

**Net Infested Area:** Actual area occupied by weed species within the gross infested area, which does not contain the spaces between individuals and populations. The total infested area (with the gross infested area) may be comprised of multiple infested areas, described by polygons, buffered points, buffered lines, or it may be calculated as the result of a stem count in which each individual is assigned a coverage multiplier.

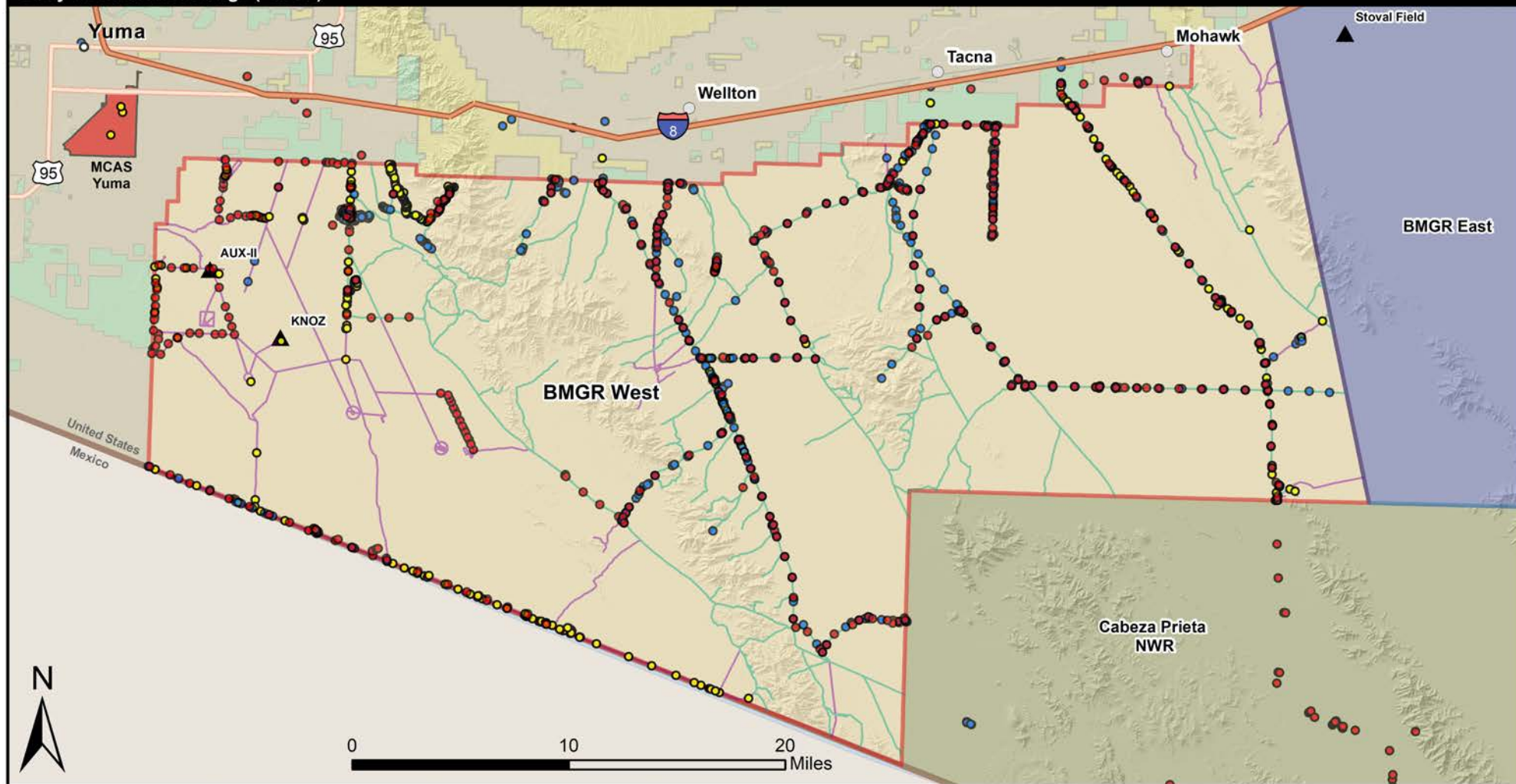
**Net Treated Area:** Treated area is either the infested area or a subset of an infested area that has received treatment. Treatment area is calculated using the same standards as those for infested area.

\* All of these terms apply to single-species measurements. When there is more than one weed species in an area, the above measurements need to be applied to each species (population) individually.

Figure 7.18: GISCloud App Invasive Species Mapping at BMGR West

2018-2023 Integrated Natural Resource Management Plan (INRMP)

Barry M. Goldwater Range (BMGR)



### Legend

- |                     |   |                                  |
|---------------------|---|----------------------------------|
| ○ City/Town         | State Trust Land                            | ● GISCloud Weed Survey 2016-2017 |
| — Interstate 85     | — BMGR Designated Admin Use Only Road       | ● GISCloud Weed Survey 2015-2016 |
| — Highways          | — BMGR Designated Public and Admin Use Road | ● GISCloud Weed Survey 2014-2015 |
| ■ MCAS Yuma         | ▲ Auxiliary Airfield (AUX)                  |                                  |
| ■ BMGR East         |   |                                  |
| ■ BMGR West         |   |                                  |
| ■ Cabeza Prieta NWR |   |                                  |
| ■ BLM               |   |                                  |

World Geodetic System 1984 (WGS84) Projection  
Zone 11 N  
GCS\_WGS\_1984

Base data from ESRI StreetMap  
Hillshade derived from USGS NED

Created By:  
Center for Environmental Management  
MILITARY LANDS  
Colorado State University



### 7.11.2 BMGR East Trespass Livestock

Since the early 1970s, feral horses and burros (*Equus* spp.) have received protection by the federal government under provisions of the Wild Free-Roaming Horses and Burros Act of 1971 (WFRHBA) (16 U.S.C. §§ 1331-1340) as amended by the Federal Land Policy and Management Act of 1976 (FLPMA) and the Public Rangeland Improvement Act of 1978 (PRIA). Technically, these animals are not wildlife; rather, they are descendants of escaped livestock. The term “wild free-roaming” provides special protections to these animals under the WFRHBA. On a national scale, the management of feral horses and burros has fallen to the BLM or U.S. Forest Service when these animals are found within a designated Wild Horse and Burro Herd Management Area (HMA). HMAs were designated in the PRIA and represent areas where wild horses and burros were documented at the time of the passage of the WFRHBA. Each HMA has an associated management plan that provides specific herd management goals and objectives and determines what each HMA’s carrying capacity or “Appropriate Management Level (AML)” should be. The HMA management plan also determines what the minimum and maximum population levels are for wild horses and burros to allow for population growth over a four- to five-year period. Each HMA’s AML is determined through a rigorous, multi-year analysis and evaluation of rangeland habitat conditions, including data on each area’s vegetation and soil resources. The AML, along with any revision to the AML, is set for each HMA in an open, public process during field planning efforts.

While stringent management guidelines are required under federal law for animals found within an HMA, animals found outside of an HMA are not provided the same protections and are often considered to be “estrays” or unauthorized horses and burros in trespass. Herd population evaluations and management constraints are not required, and the management of these trespass animals often defaults to the local land management agency as well as the state. The BMGR does not contain a designated Wild Horse and Burro HMA. The closest HMA to the BMGR is the Cibola-Trigo HMA, located 8 miles north of the BMGR West or 40 miles west of the BMGR East along the Colorado River (Figure 7.23). Management of trespass horses



Figure 7.20: Trespass burros impacting areas of BMGR East.



Figure 7.19: Impact to native vegetation by trespass livestock. This ocotillo has been partially girdled by trespass burros.

and burros at BMGR has fallen to the 56 RMO and MCAS Yuma RMD staff at BMGR East and West, respectively. The 2007 and 2012 INRMPs, as well as the annual INRMP reviews (2013–2017), have repeatedly expressed that trespass livestock, specifically cattle, horses, and burros (hereafter “trespass livestock”), are an increasingly greater problem. Impacts of these animals to natural resources are typically greater at BMGR East given its proximity to adjacent grazing allotments and other land uses. Issues and impacts related to trespass livestock that either have been observed occurring or have the potential to occur at BMGR include, but are not limited to

- extensive destruction and degradation of sensitive plant species and Sonoran Desert native plant communities;
- increased competition with native protected/endangered wildlife species for available forage and water resources (i.e., Sonoran pronghorn);
- potential for disease transmission to native wildlife species;
- increased soil degradation and erosion potential;
- surface water depletion and destruction of environmentally sensitive/culturally significant water resources;
- potential water-quality impacts associated with fecal contamination and increased erosion and sedimentation;
- destruction and trampling of cultural resource sites;
- invasive plant species seed dispersal; and
- increased public safety risk from livestock/vehicle collisions with potential to impact all range users including
  - public recreationists;
  - BP;
  - 56 RMO and MCAS Yuma RMD staff and support personal, other range managers, and contractors; and
  - military personnel.
- Potential direct negative impacts to the military training mission include but are not limited to
  - delays, interruptions, and cessation of live-fire training missions if animals are on range;
  - increased risk of vehicle collisions during ground-based training efforts; and
  - increased wildfire risk if trespass animals aid in the dispersal of fire-adapted weed species.

Given that BMGR does not contain a designated Wild Horse and Burro HMA and that protections provided under applicable federal law (i.e., WFRHBA, FLPMA, PRIA) do not extend to trespass horses and burros on the range, the 56 RMO and MCAS Yuma RMD staff wish to develop policies, programs and methods to aid in the management of these animals. Consequently, 56 RMO and MCAS Yuma RMD staff and staff at partner agencies, AGFD and USFWS, were prompted during the 2016 INRMP Annual Review process to revise the Resource-Specific Goal RS4.5 from "Remove privately owned

animals from the BMGR" to "Monitor and control trespass animals and livestock at the BMGR, and assess and mitigate their impacts."

Based on this revised Resource-Specific Goal, the 56 RMO staff at BMGR East are planning to develop a Trespass Livestock, Horse, and Burro Management Plan that addresses all aspects of management and monitoring of these animals and defines the roles and responsibilities for all parties henceforward. This plan will ensure humane treatment of all animals while reducing impacts to natural and cultural resources and the military training and mission readiness. This plan will provide clear policies, programs, and methods to ensure that the INRMP goal of monitoring and controlling trespass animals and livestock is met.

While the development of this management plan will be a priority over the next five years, there are management actions that the 56 RMO staff can initiate now, under this INRMP, in recognition of the need to reduce negative impacts from trespass livestock. These include the strategies as follows.

### ***Working with Surrounding Land Management Agencies***

The 56 RMO and MCAS Yuma RMD staff will work cooperatively with surrounding land management agencies and individuals (BLM, USFWS, BLM grazing permittees, Tohono O'odham Nation), as well as the Arizona Department of Agriculture (AZDA) and the AGFD, to ensure coordinated management of trespass livestock. In addition, staff from the BMGR will continue to participate in the Interagency Feral Livestock Committee.

### ***Fencing***

The BMGR staff recognize that Arizona is a fence-out state, meaning it is the property owner's responsibility to keep animals out, and that the BMGR does not reside in an Arizona no-fence district. While it is unfeasible to fence the entire boundary of the BMGR, certain corridors can be effectively fenced off to exclude trespass livestock. The BMGR staff will prioritize efforts to work with adjacent BLM staff and BLM grazing permittees to install new wildlife-friendly fencing, as appropriate, in strategic areas and monitor existing fencing. In addition to installing new fencing, the existing fence infrastructure will be maintained and improved as needed. The presence of trespass livestock will be continually monitored to identify additional access corridors onto the range that need fencing infrastructure installed.



Figure 7.21: Example of strategic fencing being used at BMGR East to exclude trespass livestock.

### ***Trespass Livestock Removal and Management***

Trespass livestock will be prioritized for removal from the BMGR lands following all applicable state and federal laws. The BMGR staff will work with ranchers and stakeholders to push back into BLM-managed areas any privately owned, BLM permittee livestock found on the range. All other privately

owned livestock will be rounded up and held for property recovery procedures to occur, as determined by ARS 3-1402 and 43 CFR Subpart 4150. The AZDA will complete brand inspections on all trespass livestock, and the 56 RMO will post notifications to allow owners an opportunity to recover trespass livestock.



Figure 7.22: Trespass livestock at BMGR East.

For non-branded stray livestock that are not claimed during the established recovery notification period, as outlined in ARS 3-1402, the 56 RMO shall provide a letter to the AZDA stating that all applicable state, federal and DoD rules were followed, allowing the AZDA to produce a Form 1 letter (after the livestock inspection) that will authorize USAF ownership of the animals. On becoming USAF property as determined by the State of Arizona, these animals will be sold at public auction. To initiate this new trespass livestock removal policy, staff at the 56 RMO are currently pursuing viable procurement methods and opportunities that may be used by a

contractor selected to perform duties under an awarded contract. Such duties could include but would not be limited to actively riding the range, monitoring the presence of trespass livestock, inspecting and repairing fencing, and removing trespass livestock as necessary by using established protocols and or procedures, as set forth under law and or an issued Statement of Work. The 56 RMO would also explore the possibility of having the contractor monitor for invasive weeds as well as observe and report on any other known or potential impact to natural and cultural resources.



## 7.12 Bird/Wildlife Aircraft Strike Hazard (BASH)

The BMGR lies within the Pacific Flyway, which, at this location, is a minor flyway for waterfowl and a major flyway for raptors and small songbirds. The BMGR serves as an important training area for aircraft from the 56 FW out of Luke AFB and Marine Corp Air Squadrons out of MCAS Yuma. BASH reduction plans are developed for DoD military installations where elevated hazards exist and can be controlled and mitigated, as is the case at the BMGR East and West.

### **BMGR East**

BASH concerns are greatest when aircraft fly at low altitudes (at both takeoff and landing) rather than during typical in-flight operations at BMGR. A BASH Reduction Plan is in place for Gila Bend AFAF. In accordance with this plan, the USAF uses the AHAS, which is a data-driven, remote-sensing system to alert aviators about the presence of birds in the airspace. The AHAS system evaluates weather and radar data and provides real-time alerts to aviators when concentrations of large birds are in the airspace. The AHAS is available online and coverage includes the entire continental U.S. Additionally, as part of the prevention program, AHAS provides pilots and flight schedulers with a near real-time tool when selecting flight routes. The BMGR East plan is based on Luke AFB's BASH Reduction Plan and 56 FW OPLAN 91-2 (56 FW 2013), and it focuses on reducing the BASH threat at the Gila Bend AFAF and at the Range 1 and 2 lead-in-lines.

Environmental management guidelines, as identified in the BASH Reduction Plan for Gila Bend AFAF, include controlling vegetation (e.g., maintaining vegetation height between 7" and 14 inches, removing dead vegetation, removing perches), controlling water (e.g., modifying ditches, eliminating standing water), controlling waste (e.g., collecting and disposing waste rapidly), and controlling birds through chemical and physical alterations (e.g., bird-proof structures, insect and rodent control). Priority BASH management actions under this plan include

vigilant threat monitoring and reporting, management of the environment both at and surrounding the Gila Bend AFAF, carrion removal along SR 85 to reduce the abundance of large avian scavengers (e.g., turkey vultures), and bird/wildlife harassment and depredation, as required. A private contractor is currently conducting daily threat monitoring at Gila Bend AFAF and for areas of BMGR East near Range 1 and 2. Status reports are issued on a monthly basis. These reports summarize, in part, the number of BASH strikes/month, number of BASH threat days/month, number of surveys

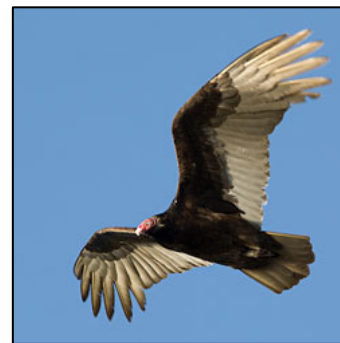


Figure 7.24: Turkey vultures represent a major BASH threat. Photo courtesy of NPS.



Figure 7.25: F-16 preparing for take-off at Gila Bend AFAF. Photo courtesy of Luke AFB.

conducted/month, average number of birds by size, max and mean animal counts/month by species, total carrion removed/month and location of disposal, and other environmental information (e.g., wastewater pond depth). In addition to monthly reporting, the contractor is also providing annual BASH reports that summarize and analyze all monthly data and provides useful trend data to the 56 RMO (Tunista Services, LLC, and Chiulista Services 2012–2016). A summary of the annual BASH management data results for 2012–2016 is provided in Table 7.3.

Table 7.3: Summary of BASH management actions taken annually over the last five years (2012–2016) at the Gila Bend AFAF and other areas at BMGR East.<sup>1</sup>

Year	BASH Threat Days			BASH Strike	Carrion Removed	Number of Times	
	Low	Moderate	Severe			Wildlife Harassed	Wildlife Depredated
2012	247	0	0	1	149	5	0
2013	249	1	1	2	192	6	0
2014	269	6	0	1	273	8	0
2015	269	4	0	2	396	1	0
2016	250	3	0	1	200	16	0
<b>Total</b>	<b>1,284</b>	<b>14</b>	<b>1</b>	<b>7</b>	<b>1,210</b>	<b>36</b>	<b>0</b>

<sup>1</sup> Source: The Annual BASH Summary Reports for the BMGR East (Tunista Services, LLC, and Chiulista Services 2012–2016).

Bird harassment and depredation at Gila Bend AFAF is authorized by the USFWS through a permit issued annually to the 56 FW, which applies to both Luke AFB and Gila Bend AFAF (USFWS 2017). A log of BASH harassment and depredation events at Gila Bend AFAF is being retained and updated by the 56 RMO and includes all incidents dating back to 2006. Mammal depredation (e.g., rabbits and coyotes) at Gila Bend AFAF is authorized by a permit issued annually by AGFD to the 56 RMO/ESM and applies only to Gila Bend AFAF.

Primary avian species surveyed under this project include, but are not limited to, turkey vulture (*Cathartes aura*), common raven[s] (*Corvus corax*), raptors species (e.g., red-tailed hawk [*Buteo jamaicensis*]), prairie falcon, golden eagle, American kestrel (*Falco sparverius*), etc.), doves (mourning doves, white-winged doves, Eurasian collared-doves), and horned larks (*Eremophila alpestris*). Round-tailed ground squirrels are also surveyed at Gila Bend AFAF, as they represent one of the main food sources for raptors species. Data are provided in the Annual BASH Summary Report for the BMGR East (Tunista Services, LLC, and Chiulista Services 2012–2016). Species included in the “other” species category include lark bunting (*Calamospiza melanocorys*), greater roadrunner (*Geococcyx californianus*), green-winged teal (*Anas crecca*), long-billed curlew (*Numenius americanus*), black-tailed jackrabbit (*Lepus californicus*), coyote, and kit fox.

Table 7.4: Summary of annual survey results for four locations at Gila Bend AFAF and BMGR East.

Species	Year	Gila Bend AFAF			Gila Bend AFAF Perimeter			SR 85 (Range 1 and 2)			Gila Bend AFAF Oxidation Pond		
		Total Individuals	Times Observed	No. Surveys	Total Individuals	Times Observed	No. Surveys	Total Individuals	Times Observed	No. Surveys	Total Individuals	Times Observed	No. Surveys
Avian sp.	2012	9,440	247	247	1,213	72	72	968	113	113	4,581	74	74
Ground squirrel	2012	384	127	247	0	0	72	0	0	113	0	0	74
Other	2012	658	136	247	2,652	71	72	540	98	113	1,978	74	74
Total		10,482		247	3,865		72	1,508		113	6,559		74
Avian spp.	2013	13,408	251	251	2,678	108	108	1,409	138	138	5,888	107	107
Ground squirrel	2013	124	58	251	0	0	108	0	0	138	0	0	107
Other	2013	1,525	178	251	3,236	108	108	383	117	138	3,130	106	107
Total		15,057		251	5,914		108	1,792		138	9,018		107
Avian spp.	2014	17,251	251	251	3,668	113	113	1,891	148	148	7,097	87	87
Ground squirrel	2014	200	79	251	0	0	113	0	0	148	0	0	87
Other	2014	1,759	248	251	3,835	113	113	825	134	148	3,809	87	87
Total		19,210		251	7,503		113	2,716		148	10,906		87
Avian spp.	2015	15,598	250	250	2,295	88	88	2,381	173	173	4,270	81	81
Ground squirrel	2015	164	93	250	0	0	88	0	0	173	0	0	81
Other	2015	893	34	250	3,560	88	88	364	95	173	2,804	81	81
Total		16,655		250	5,855		88	2,745		173	7,074		81
Avian spp.	2016	8,640	254	254	3,152	147	147	1,949	107	107	5,540	131	131
Ground squirrel	2016	300	122	254	0	0	147	0	0	107	0	0	131
Other	2016	1,011	150	254	3,271	147	147	407	102	107	3,423	81	131
Total		9,951		254	6,423		147	2,356		107	8,963		131
All Years Total		71,355		1,253	29,560		528	11,117		679	42,520		480

Source: The Annual BASH summary reports for BMGR East (Tunista Services and Chiulista Services 2012–2016).

**BMGR West**

A BASH Reduction Plan has been developed and implemented for the BMGR West (USMC 2014). The BASH program is governed by the MCAS Yuma BASH Working Group, which meets quarterly to assess the status of the BASH Reduction Program and provides recommendations and guidance for improving program delivery. These meetings are held in conjunction with the Commanding Officer's Safety Council meetings and are coordinated by the MCAS Yuma Installation Aviation Safety Officer. Personnel on the BASH Working Group are listed below.

- Commanding Officer (Chairperson)
- Airfield Operations Officer
- Air Traffic Control Facility Officer
- Conservation Manager
- Aviation Safety Officer
- Natural Resources Specialist
- Pest Management Officer
- Tenant Unit Representatives
- Marine Aircraft Group 13
- Marine Aviation Weapons and Tactics Squadron 1
- Marine Fighter Training Squadron 401

The MCAS Yuma BASH Reduction Plan outlines the management requirements and coordination procedures for all BASH Working Group personnel. The MCAS Yuma Conservation Manager maintains all required dispersal/depredation permits and harassment/depredation equipment. The MCAS Yuma Conservation Manager also retains all BASH records and ensures that properly trained personnel are available for required management actions. The Conservation Office monitors migratory, seasonal, and resident bird activities and serves as liaison between MCAS Yuma and the USFWS, AGFC, U.S. Department of Agriculture Animal and Plant Health Inspection Service, and the Audubon Society. All remains from BASH strike incidents are sent to the Smithsonian Institute for official review, identification, and cataloging.

**7.13 Coastal Zone and Marine Resources Management**

The BMGR does not encompass any coastal or marine areas. The coastal area nearest to the installation is the Gulf of California, Mexico, approximately 40 miles south of the installation.

**7.14 Cultural Resources Protection**

The USAF and USMC are responsible for protecting and managing the cultural resources at BMGR in accordance with a suite of federal laws and regulations. Federal law protects cultural resources that satisfy government criteria for being listed on the National Register of Historic Places. The USAF and USMC, in consultation with tribes and other interested parties, work with the Arizona State Historic

Preservation Office in Phoenix, Arizona, to determine which resources are eligible for listing. Activities that provide protection for cultural resources at BMGR indirectly support the military mission by preventing or minimizing conflicts between military operations and resource protection goals.

### ***BMGR East***

The most recent ICRMP for BMGR East was implemented in 2009. An update to the ICRMP is currently in progress and expected to be finalized in 2018. A key component of the MLWA is the integration of natural and cultural resource concerns through the successful implementation of the ICRMP and cultural resource concerns through the successful implementation of the ICRMP and INRMP. These efforts have been identified as a series of action items in the Management Action Plan, some of which are high priorities for the five years covered by the ICRMP. These action items are listed below.

- Complete surveys and Section 106 reviews as needed to support range improvements and sustain the training mission.
- Sustain the training mission by including actions proposed in the CRP (in prep.)
- Carry out the actions required under the programmatic agreement for INRMP implementation and complete cultural resource inventories and Section 106 review of INRMP-related actions not covered by the programmatic agreements.
- Synthesize cultural resource data, evaluate the historic significance of recorded resources, and make determinations of eligibility for inclusion on the National Register of Historic Places.

Archaeological surveys have been conducted in both military use zones and public access areas. Public recreation, and the associated effects, are potential threats to cultural resources. To determine the extent of the threat, the programmatic agreement for implementation of the 2007 INRMP required the prioritization of surveys along roads and adjacent areas likely to be affected by public access (56 RMO 2009). Surveys conducted along public access roads in Area B have identified at least 39 resources eligible for inclusion on the National Register of Historic Places (Tagg and Blake 2012). The USAF developed strategies to protect these resources from public use activities, such as vehicle based camping, campfires, theft, and vandalism. Strategies include regular monitoring of known resources, permit enforcement, and increased recreational supervision.

Most of the projects that require surveys of large, contiguous areas are related to military actions. The 56 RMO is committed to systematic surveys of areas affected by ongoing training activities and, as of 2015, surveys had been conducted on 199,391 acres of BMGR East. Surveys and projects that have been completed since the 2012 INRMP are listed below.

- Completed in 2012—Intensive archaeological survey of 1,003 acres on Manned Range 1
- Completed in 2012—Petroglyph recording: Lookout Mountain, Area B
- Completed in 2012–2013—Archaeological survey and condition assessment of the GPS site (AZ Z:5:55 [Arizona State Museum])
- Completed in 2012–2013—Stoval Supplemental Project: Resurvey 50 acres and

archeological testing of six sites

- Completed in 2013—Pathways to Preservation: Archaeological Research Design and Management Strategy for the Barry M. Goldwater Range East
- Completed in 2013—Petroglyph recording, Black Tank, Range 2
- Completed in 2014—Intensive archaeological survey of 155 acres for the Sierra del Diablo pronghorn forage plot pipeline realignment in the Southern San Cristobal Valley
- Completed in 2014—Emergency archaeological survey, rerecording, and remapping of AZ Z:5:68 (Arizona State Museum)
- Completed in 2014—Hand excavation testing to determine presence of subsurface archaeological site
- Completed in 2015—Mechanical excavation to determine content and extent of AZ Z:5:68 (ASM)
- Completed in 2015—Draft and final Historic Properties Treatment Plan for data recovery
- Completed in 2015—Archaeological data recovery at five sites within the runway clear zone, Gila Bend Air force Auxiliary Field (AFAF)
- Completed in 2015—Intensive archaeological survey of 500 acres in Rankin Valley
- Completed in 2015—Intensive archaeological survey of 154 miles (6,209 acres) and 2,831 acres of interstitial space: recording of 106 sites
- Completed in 2017—Intensive archaeological survey of 1,500 acres of Rankin Valley
- Completed in 2017—Data recovery within the APE of AZ Z:5:68 (ASM), Range 1 Road Emergency
- Completed in 2017—Native American Graves Protection and Repatriation Act reburial on the Tohono O’odham Nation
- Completed in 2016—Vanderpot, Rein, et. al., Gila Bend Air Force Auxiliary Field: Archaeological Data Recovery at Five Sites and One Isolate within the Airfield Flight-Line Clear Zone, Barry M. Goldwater Range East, Arizona. Cultural Resource Studies in the Western Papagueria 30, Barry M. Goldwater Range East Cultural Resource Management Program, Luke AFB, Arizona
- In-house projects
  - Intensive archaeological surveys for remodeling artificial wildlife waters, placement of weather stations, pronghorn forage plots and waters, removal of contaminated soil, wildcat roads, and extensions to existing roads
  - Site condition assessments of sites on all three tactical ranges

The Arizona Site Stewards Program (ASSP) is a key component of site monitoring efforts at BMGR East. The ASSP trains and uses volunteers to monitor sensitive or threatened sites on public lands throughout the state. Currently over 800 trained volunteers monitor the condition of historic, prehistoric, and paleontological sites. Their efforts constitute a crucial supplement to the limited staff resources of most federal and state agencies. Site Steward training involves both classroom

instruction and fieldwork covering antiquity laws, crime-scene management, site and feature identification, and map reading.

The ASSP is led and sponsored by Arizona State Historic Preservation Office, the Governor's Archaeology Advisory Commission, and public land managers throughout Arizona, including the 56 RMO. The 56 RMO cultural resource manager serves as the Agency Coordinator for ASSP activities and identifies and prioritizes sites to be monitored and prepares handbooks to be used for this purpose by Site Stewards. A volunteer Regional Coordinator monitors the activities of Site Stewards working at BMGR East.

### ***BMGR West***

The MCAS Yuma and 56 RMO cultural resources programs for BMGR West and East, respectively, produced a three-volume ICRMP in 2009. The ICRMP provides guidance for managing cultural resources on the entire BMGR in accordance with the National Historic Preservation Act and other applicable laws and regulations. Volume 1 addresses the background and management issues germane to both BMGR West and East—the physical setting, resource laws, culture history, and other landscape-scale elements. Volume 2 specifically addresses BMGR East and, as mentioned above, is superseded by a 2017 ICRMP. Volume 3 specifically addresses BMGR West.

In 2011, the MCAS Yuma Cultural Resources Manager considered the writing of the BMGR West portion of the most recent ICRMP to be complete. The final draft of the ICRMP, however, was never presented to the Commander for signature; thus, it was never executed. MCAS Yuma awarded a contract in August 2017 to have the 2011 ICRMP rewritten to correct deficiencies and update the management strategy. Completion of the new BMGR West ICRMP is anticipated in September 2019 and, among other changes, it will include Standard Operating Procedures and an assessment of current data gaps.

Approximately 137,000 acres (20 percent) of the roughly 694,000 acres of the western portion of BMGR West has been systematically surveyed. These surveys have resulted in the recording of approximately 350 sites. Survey reports completed since 2012 are listed below.

- Completed in 2013—Cultural resources survey for a renewable energy project for MCAS Yuma
- Completed in 2013—Archaeological Survey Report of Negative Findings for the Laser Spot Video Recording System at Barry M. Goldwater Range West
- Completed in 2014—Archaeological Survey Report of Negative Findings for the Range One Expansion on the Barry M. Goldwater Range West
- Completed in 2015—An archaeological survey of 21,941 acres at Barry M. Goldwater Range West, Marine Corps Air Station, Arizona
- Completed in 2015—Archaeological Survey Report of Negative Findings for a Proposed Earthquake Early Warning Sensor on the Barry M. Goldwater Range West
- Completed in 2016—Archaeological survey of 6,289 acres on the Barry M. Goldwater Range West, Yuma County, Arizona
- Completed in 2016—Archaeological Survey of 26,172 Acres on the Barry M. Goldwater

### Range West, Marine Corps Air Station Yuma, Arizona

The MCAS Yuma cultural resources program, in accordance with Section 110 of the National Historic Preservation Act, requests funding each year to complete the survey of BMGR West. As with BMGR East, this goal will not be realized for several years simply due to the magnitude and cost of the task. The ICRMP update, now underway, will detail the Marine Corps' short and long-term plans for compliance with Section 110.

#### 7.14.1 Traditional Ecological Knowledge

Traditional Ecological Knowledge (TEK) is the evolving knowledge held by indigenous and local cultures about their immediate environment and the cultural practices that build on that knowledge (USFWS 2011). TEK is location specific and includes detailed knowledge of the relationships between plants, animals, natural phenomena, landscapes and timing of events that are used for lifeways, including but not limited to hunting, fishing, trapping, agriculture, and forestry; and a holistic knowledge or "world view" that parallels the scientific discipline of ecology (USFWS 2011). This body of knowledge, practice, and belief, is continually evolving by adaptive processes and is handed down through generations by cultural transmission about the relationships of living beings (human and non-human) with one another and with the environment (see the USFWS's *Native American Policy* [USFWS 2016]).

TEK and western science are each a separate body of knowledge that overlap and can be complementary. TEK can be used to guide empirical or experimental studies to learn more about plant-animal interactions. Testing indigenous hypotheses through western scientific processes to identify the relative degree of exclusivity of relationships could result in additional insights of significance to ecological and evolutionary theory (Nabhan 2000). A number of these studies have revealed that indigenous knowledge of biotic relationships involving rare plants or animals can help guide the identification, management, protection or recovery of habitat for these species (Nabhan 2000). As such, TEK can help fill the gaps in western science and has a relevant and meaningful role in a government agency's decisions.

The USFWS, in coordination with representatives from tribes across the country, worked together to update the USFWS policy (USFWS 2016), which provides guidance for inclusion of TEK into management decisions. This means using the best available data and soliciting and considering other sources of information, such as the traditional knowledge and experience of affected tribal governments in policies, military actions, and determinations that have tribal implications. To incorporate TEK into its land management decisions, the USFWS Native American Policy states that resource managers should promote enhanced and ongoing communication, cooperation, and trust with tribes and consider the traditional knowledge, experience, and perspectives of Native American people to manage fish, wildlife, and cultural resources (USFWS 2016). Working collaboratively with local tribal governments, government agencies can help to protect confidential or sensitive information, including location, ownership, character, and use of cultural resources and sacred sites where disclosure may cause a significant invasion of privacy; risk harm to the historic resource; or impede the use of a traditional religious site by practitioners, to the extent allowed by law (USFWS 2016).

Although the DoD does not currently have a policy that explicitly directs DoD agencies to incorporate TEK into its management philosophy, there are directives, instructions, and other relevant documents that spell out the need to address concerns and needs of federally recognized American Indian Tribes and keep them in communication loops regarding decisions and actions that could affect their lands, resources, and quality of life. Air Force Policy Directive 30-70 (USAF 1994a), section 3.3, stipulates that, “The Air Force will conserve natural and cultural resources through effective environmental planning.” Policy 1.3.1 of AFI 90-2002 (*Air Force Interactions with Federally-Recognized Tribes* [USAF 2015b]) directs the USAF to “Take into consideration the significance that tribes place on protected tribal resources.” Policy 1.5.2 of AFI 90-2002 further specifies that, “...since most tribes attribute cultural significance to natural resources, tribes should be briefed on the content of the natural resources program, and provided the opportunity to consult on and participate in, as appropriate, update or development of INRMPs, AFI 32-7064, Natural Resource Management Program in accordance with the Installation Tribal Relations Plan.” Involving tribal representatives in decisions regarding natural resource projects, particularly those involving eagles and other protected species, will help to ensure that TEK is taken into consideration. Finally, the USMC handbook (USMC 2004) for preparing, revising, and implementing INRMPs states that, “Marine Corps installations must consult with federally recognized Indian tribes whose interest may be affected by land management on the installation when preparing an INRMP.... In consultation for the INRMP, American Indian tribes may identify areas and resources present on the installation that are important to the tribe, provide advice on conservation needs and priorities, and share their specialized knowledge of the resources on the installation.”

## 7.15 Public Outreach

As the primary users and managers of BMGR East and West, the USAF and the USMC, respectively, have been delegated several responsibilities. One of these responsibilities is to manage the range in a way that ensures long-term use of the facility as a premier military training location while also ensuring management and protection of natural and cultural resources. In that capacity, the USAF and USMC routinely provide forums for public outreach and opportunities for the public to learn about and provide input on various actions proposed for the BMGR. This section provides an overview of the various public involvement programs and opportunities. Focus areas for public involvement programs are listed below.

- Tours
- Indian Nations briefs
- Published articles
- Speaking events
- Media coordination
- Special projects and events
- Miscellaneous requests and participation in events

### **7.15.1 BMGR Executive Council**

The BEC includes representatives of federal and state agencies with statutory authority and management responsibility for the range and adjacent federal lands, and the resources on those lands: MCAS Yuma, BLM, USFWS, AGFD, CBP, and directors for the adjacent Sonoran Desert NM, Organ Pipe Cactus NM, and Cabeza Prieta NWR. The BEC is chaired by the Director of the 56 RMO and meets six times a year to share information and discuss and propose solutions to regional issues.

### **7.15.2 BMGR Intergovernmental Executive Committee**

The MLWA of 1999 directed the Secretary of Interior, Secretary of the Air Force, and the Secretary of the Navy to establish an IEC to be comprised of selected representatives from federal, state, local, and tribal governments. The IEC is established solely for the purpose of exchanging views, information, and advice relating to the management of natural and cultural resources of the withdrawn lands. The IEC is chaired by the MCAS Yuma Conservation Manager and is composed of representatives from the USAF, USN, and Department of Interior as well as representatives of other federal, state, county and municipal government agencies and Native American tribes that have interests in BMGR. The IEC meets three times per year in January, May, and September. IEC meetings provide opportunities to educate and seek input from the public and special interest groups on management of BMGR's natural resources. Meeting dates are announced at the conclusion of each meeting and reminders are emailed to individuals on the IEC's distribution list to provide several months' notice. The IEC meeting minutes are posted on a public website.

#### ***BMGR East***

Public outreach efforts by the USAF provide input on the development of information and infrastructure improvements to facilitate public recreational activities, as follows.

- Updated public visitation maps and rules for public education and recreation use
- An informational video for visitors that addresses safety and environmental awareness
- Installation of signs, gates, and fences to support road infrastructure and public access

The USAF conducts public meetings on various issues that are announced via its website, newsletters, mailings, newspaper advertisements or legal notices, and other means. The Luke AFB maintains a web page containing information for BMGR East public outreach opportunities (<http://www.luke.af.mil/News/>).

Public participation has increased from the previous years for all of the activities listed above. Ongoing exercises and operations continue to generate media interest both at Gila Bend AFAF and the BMGR. Requests for speakers, briefings, appearances, and tours continue to grow, along with requests for participation in town, county, and state meetings, to coordinate efforts and share information.

#### ***BMGR West***

Public outreach efforts by the USMC have included improving information and infrastructure to facilitate public recreational activities at the BMGR West, as follows.

- A bird checklist is available for birding enthusiasts.
- A public brochure and map with details on road access retained for public access and range rules (e.g., rules for camping, off-road vehicle travel, rock hounding, firewood collection, hunting, native plant or wood collection, mine entry, recreational shooting, and trash disposal) are made available to the public.
- Signs, gates, and fences have been installed to support road infrastructure and public access.
- Tours of various BMGR West features or resources, such as the Fortuna Mine, are offered.
- Meetings are held with local non-governmental groups, such as the Yuma Valley Rod and Gun Club, to issue recreation access permits.
- RMD staff visit local recreational vehicle parks to educate seasonal visitors about the BMGR West recreational program.

The CLEOs are primarily responsible for MCAS Yuma's public outreach efforts because they patrol the range seven days a week. In addition, visitors are provided with a brochure that includes a detailed map of road classification (i.e., public, closed, administrative access) and a list of approved and prohibited recreational activities (e.g., camping, off-road vehicle travel, rockhounding, hunting). Guided range tours (e.g., mine tours) can be scheduled through the RMD staff. Finally, the RMD promotes public outreach by supporting research opportunities, publication of research results in peer reviewed journals, and researcher participation in science conferences and symposiums.

## 7.16 Geographic Information Systems (GIS)

GIS is used in daily operations as the data support for the natural and cultural resource and environmental stewardship programs. Over the next five years, geospatial data will be updated periodically and several new types of GIS data will be acquired including, but not limited to, the following actions.

- Further refining and delineating important wildlife habitats and corridors
- Monitoring and tracking sensitive and endangered wildlife and plant species
- Monitoring and managing habitat disturbance and restoration efforts
- Monitoring and tracking invasive species and reporting control effort results
- Monitoring and tracking trespass livestock and monitoring impacts associated with their presence
- Analyzing projects for NEPA compliance and storing data for regulatory reporting
- Updating the transportation road layer including delineating new unauthorized routes
- Identifying and monitoring cultural resource sites
- Completing the BMGR East range wide vegetation mapping effort and completing integration and edge matching with other similar regional vegetation mapping products (i.e., Malusa 2003)
- Monitoring and delineating drag road impacts and prioritizing areas for restoration and

maintenance.

- Updating infrastructure layers as the military training mission changes and as the BP's mission is modified.

### ***BMGR East***

USAF Instruction 32-10112, *Installation Geospatial Information and Services* (USAF 2007), provides the policy and guidance for GIS management on all USAF installations including. Geospatial data are maintained and managed by the 56 RMO Environmental Science and Management Office. The GIS server resides in the 56th Communication Squadron Network Communication Center and on the NIPRNet. Additionally, the geospatial data are maintained within the USAF GeoBase System and services are provided through the GIS database that is centrally located on the server. The BMGR East GIS program currently utilizes software from ESRI (Environmental Systems Research Institute) for GIS data management and use. The 56 RMO and 56th Civil Engineer Squadron adhere to the Spatial Data Standards for Facilities, Infrastructure, and Environment, as required by the DoD, to provide GIS standardization for table structure, metadata, and data storage among all DoD installations.

### ***BMGR West***

USMC MCO 11000.25a, *Installation Geospatial Information and Services Program* (USMC 2013a), also referred to as USMC Installation Geospatial Information and Services (GEOFidelis), provides the policy, guidance, and standards for acquiring, protecting, and utilizing geospatial data and GIS data management in support of USMC installations. Geospatial data are maintained and managed by the MCAS Yuma RMD within the USMC GEOFidelis System. The GEOFidelis program goal is to ensure that USMC installation geospatial data are complete, accurate, current, and available as a USMC-wide resource. The MCAS Yuma RMD and MCAS Yuma Civil Engineer/GIS Department adheres to the Spatial Data Standards for Facilities, Infrastructure, and Environment, as required by the DoD, to ensure GIS standards are used for table structure, metadata, and data storage among all DoD installations.

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## CHAPTER 8 MANAGEMENT GOALS AND OBJECTIVES

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Management policy (MP) goals reflect the values and desired future condition of natural resources; thus, they serve as the focal points for implementing the INRMP. MP goals are not resource-specific, but they are consistent with the military mission for protecting and conserving natural and cultural resources and public access to BMGR. This section identifies management issues and establishes management responsibilities, implementation schedules, and funding requirements for each of the five established natural resource management goals. Both the MP and resource-specific (RS) management goals have range-wide application. In no implied order of importance, the five management policy (MP) goals are listed below.

**MP1.** Maintain and enhance natural resources to ensure that these resources are sustained in a healthy condition for compatible uses (e.g., low-impact recreation) by future generations while supporting the existing and future military purposes of the BMGR.

**MP2.** Manage cultural resources in accordance with the BMGR ICRMP.

**MP3.** Provide for public access to BMGR resources for sustainable, multi-purpose use, consistent with military purposes of the range (including security and safety requirements) and ecosystem sustainability.

**MP4.** Apply ecosystem management principles through a goal-and-objective-driven approach that recognizes social and economic values; is adaptable to complex, changing requirements; and is realized through effective partnerships among private, local, state, tribal, and federal interests.

**MP5.** Meet or exceed the statutory requirements of the MLWA of 1999, Sikes Act, and other applicable resource management regulatory requirements.

The RS goals address earth, water, vegetation, wildlife, and visual resources; transportation; recreation; Native American access; non-military and perimeter land use; and special natural/interest areas. RS goals aligned with MP2 are included in the ICRMP and do not appear in the INRMP. The RS goals are presented in Table 8.1 (in no implied order of importance).

Table 8.1: Resource-specific management goals.

<b>Resource-Specific (RS) Goal No.</b>	<b>Resource Management Category</b>	<b>Management Goal(s)</b>
<b>RS1</b>	Earth Resources	Subject to budgetary constraints, implement best-management practices to control and prevent soil erosion, implement soil conservation measures, and restore or rehabilitate degraded landscapes wherever practicable, subject to budgetary constraints.
<b>RS2</b>	Water Resources	Manage water resources to protect, maintain, and improve water quality; conserve water to prevent lowering of the water table levels; and ensure compliance with regulatory requirements while maintaining unrestricted access for military purposes.
<b>RS3</b>	Vegetation Resources	Protect and conserve plant communities and species diversity. Identify, protect, conserve, manage, and comply with regulatory requirements for threatened and endangered species or other important or sensitive species. Continue to inventory the range for occurrence and distribution of exotic species and implement management measures for their removal or control. Restore or rehabilitate altered or degraded plant communities wherever practicable, subject to budgetary constraints. Continue to incorporate the principles of ecosystem management and promote biodiversity.
<b>RS4</b>	Wildlife Resources	Protect and conserve wildlife habitat, species diversity, and viable populations. Identify, protect, conserve, manage, and comply with regulatory requirements for federally threatened and endangered wildlife species or otherwise significant or sensitive species. Restore or rehabilitate human-altered or degraded wildlife habitats wherever practicable, subject to budgetary constraints. Continue to incorporate the principles of ecosystem management and promote biodiversity. Monitor and control trespass animals and livestock and assess and mitigate their impacts.
<b>RS5</b>	Visual Resources	Protect or enhance the integrity and diversity of visual resources (including scenic qualities of the landscape).

Table 8.1: Resource-specific management goals.

<b>Resource-Specific (RS) Goal No.</b>	<b>Resource Management Category</b>	<b>Management Goal(s)</b>
<b>RS6</b>	Transportation	<p>Continue to implement the transportation plan that addresses continued land-based access for military training and testing; provides access for wildlife research and wildlife habitat management, land management, and law enforcement by federal and state agencies; and provides access for wildlife-oriented recreation and sustainable multipurpose use by the public, including access to sacred sites and traditional cultural places.</p> <p>Implement established policies and procedures that ensure that vehicle will be controlled and directed so as to protect resources, promote safety, and minimize conflicts among the various uses of the range.</p>
<b>RS7</b>	Recreation	<p>Provide for public access and use of land and natural resources for sustainable multi-purposes when such activities are compatible with mission activities and other considerations such as security, safety, and resource sensitivity.</p> <p>Manage all activities in accordance with the ICRMP.</p>
<b>RS8</b>	Native American Access	Provide for Native American access to Traditional Cultural Places, Sacred Sites, and protect resources which include plants, clay, minerals, etc. Tribes may hunt with a valid AGFD permit.
<b>RS9</b>	Non-Military Land Use	<p>Maintain a program for addressing rights-of-way.</p> <p>Participate in local initiatives to advance eco-regional planning and biodiversity goals.</p>
<b>RS10</b>	Perimeter Land Use	<p>Cooperate with land managers of adjoining property for conservation, public relations, and compliance benefits.</p> <p>Develop strategies, in coordination with ranchers when feasible, to reduce trespass livestock occurrences.</p>
<b>RS11</b>	Special Natural/Interest Areas	Recognize existing special resources and/or areas in which special resources are identified; consider the applicability of special management provisions for the protection of these areas.

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## CHAPTER 9 INRMP IMPLEMENTATION, UPDATE, AND REVISION PROCESS

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### 9.1 Natural Resources Management Staffing and Implementation

The Sikes Act encourages the DoD to provide adequate staffing with the appropriate expertise for updating, writing, and implementing the INRMP within the scope of DoD component responsibilities, mission and funding requirements.

#### BMGR East

The 56 RMO/ESM includes archaeologists, wildlife biologists, environmental planners, and a munitions disposal expert (CRP, in prep.). The 56 RMO/ESM support military training by managing the natural and cultural resources of the range in accordance with applicable laws, EOs, and directives (CRP, in prep.). The 56 RMO/ESM also provides Contracting Officer's Representative oversight of the pronghorn monitoring function of the range operations contract, and ESM staff serves as the Contracting Officer's Technical Representative on contracts for cultural resources and other services.

#### BMGR West

The MCAS Yuma RMD staff are experts in the fields of natural and cultural resources management and conservation law enforcement. The staff is devoted to providing the resources and expertise in the planning and implementation of advanced training and exercises while fulfilling the goals and objectives of this INRMP.

In August 2015, a cooperative agreement was signed between the USACE Omaha District and the AGFD (USACE and AGFD 2015) to "collect, analyze, and apply environmental and cultural resource data and implement land rehabilitation and maintenance for optimal management of lands under control of the DoD..." (USACE 2015). The cooperative agreement provides the DoD assistance for executing prescribed tasks to implement the goals and objectives of the INRMP.

### 9.2 Monitoring INRMP Implementation

The BMGR's natural resource management has been mostly limited to actions taken for the benefit of protected or special status species (e.g., Sonoran pronghorn, acuña cactus, and FTHL). This revised INRMP continues to rely heavily on the most current biological data sets, general and species-specific wildlife surveys, research projects, and regional data sets.

Over the next five-year period, factors upon which this INRMP is based on may change, including military mission requirements, federal list of threatened and endangered species, information available for listed species and their ecosystems, as well as the understanding of anthropogenic impacts on resources. The implementation of this INRMP, will follow an adaptive management approach that acknowledges uncertainty and monitors the various INRMP components and lessons learned with the end goal of improving the BMGR's future management actions and ecosystem health.

### 9.3 Annual INRMP Review and Update Requirements

DoD guidance provides that the annual review shall verify that

- the current information on all conservation metrics is available;
- all “must fund” projects and activities have been budgeted for and implementation is on schedule;
- all required, trained natural resource positions are filled or are in the process of being filled;
- projects and activities for the upcoming year have been identified and included in the INRMP (an updated project list does not necessitate revising the INRMP); and
- all required coordination has occurred.

All significant changes to the installation's mission requirements or its natural resources have been identified. The USAF and USMC will review the progress made in implementing the INRMP annually with AGFD and USFWS at the regularly scheduled BEC meetings and with other partners and the public at the annual IEC meetings in the fall. The USAF and USMC will track their own progress using appropriate metrics but common elements are to be reported by both. They will include funded/unfunded projects; coordination and feedback from cooperating agencies, military trainers, and range operators; timeframes for implementing projects; deliverables for complying with Biological Opinions; and attainment of project-specific objectives. The effectiveness of management guided by the INRMP also will be gauged annually by tracking the degree to which each implementation project makes progress toward attaining the resource management goals established in the INRMP. The INRMP resource management goals are presented in Chapter 8 *Management Goals and Objectives*. Current implementation projects and the resource management goal(s) addressed by each project are identified in Chapter 10 *Annual Work Plans*.

#### 9.3.1 INRMP Update and Revision Process

This INRMP update identifies proposed amendments to the 2012 INRMP and changes to natural and cultural resources management practices that would be implemented during the subsequent five-year period. This INRMP revision is available to the public, state and local governments, and Native American tribes on the Luke AFB and MCAS Yuma websites.

This is the second update of the original 2007 BMGR INRMP prepared in support of an ongoing process to review and update the INRMP every five years. This 2018 update INRMP was prepared in accordance with the MLWA of 1999, which provides that periodic reviews of the BMGR INRMP be conducted jointly by the Secretaries of the Navy, Air Force, and Interior, and that affected states and Native American tribes, as well as the public, are provided a meaningful opportunity to comment upon any substantial changes to the INRMP (Public Law 106-65 § 3031(b)(3)(E)(ix)). As part of the update process, a Public Report was distributed to describe the changes in military use, environmental conditions, and public access opportunities that have occurred since the 2012 INRMP update. The report also provides an account of the resource management and public involvement activities that have transpired during the same period. This updated INRMP includes information based on the comments received on the Public Report and responses to those comments. The next review and update of the BMGR INRMP is currently scheduled for 2023. A Public Report chronicling

changes at BMGR during each five-year review cycle will be issued concurrent with each subsequent revision.

If warranted, proposed management decisions regarding INRMP amendments and changes to management practices will be reviewed under the auspices of NEPA before being implemented. For this current INRMP update, no changes have been identified that warrant the preparation of a NEPA document.

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## CHAPTER 10 ANNUAL WORK PLANS

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In this 2018 update of the INRMP, the USAF and USMC have developed lists of actions planned for implementation during the next five years. The 17 management elements (see Chapter 7) are listed below and referenced by number in the left column of Tables 10.1 and 10.2.

1. Resource inventory and monitoring
2. Special natural/interest areas
3. Motorized access and non-road area management
4. Camping and visitor stay limits
5. Recreation services and use supervision
6. Rock hounding
7. Wood cutting, gathering, and firewood use; and collection of native plants
8. Hunting
9. Recreational (target) shooting
10. Utility/transportation corridors
11. General vegetation, wildlife, wildlife habitat, and wildlife water
12. Special status species
13. Soil and water resources
14. Air resources
15. Visual resources
16. Wildfire management
17. Perimeter land use, encroachment, and regional planning

See Appendix A for the status of action items, listed by management element, proposed in the 2012–2017 INRMP for BMGR East and West.

The 17 management elements have been categorized into five general types of actions.

1. Resource management—includes continuing the implementation of the natural resources inventory and monitoring plans
2. Motorized access—includes some modifications of the existing road network to better meet management needs that have been identified in the past five years, as described in Chapter 4, and continuing programs to direct the public to use roads remaining open to public access
3. Public use—includes several management elements for providing recreational opportunities while protecting resources
4. Manage realty—includes addressing the public utility and transportation corridors that pass through the range, and managing new right-of-way requests

5. Perimeter land use—involves monitoring land uses beyond the range to prevent encroachment, and working with other agencies in regional planning

In some cases, the USAF and USMC propose the same or similar processes and may work together for range-wide applications. In other cases, the issues associated with the BMGR East and West, will differ. Several projects will require an interagency effort in which the DoD will work with the partner agencies involved in the INRMP or other agencies, as appropriate.

Tables 10.1 and 10.2 provide the USAF and USMC actions plans. Each table includes the 17 management elements being addressed (see Chapter 7), as well as the funding year, action frequency, and the partners likely to be involved. Before proposed action steps, priorities, funding requirements, or other factors for the next five years are finalized, range managers will consider the public input, consultations with Native Americans, and any additional partner agency feedback. These lists will be reviewed annually to evaluate progress completed and to adapt the lists, when appropriate, to address emerging issues, changing priorities, availability of funds, or other issues.

10.1 Annual Implementation

Table 10.1: BMGR East 5-Year Action Plan FY 2019–2023.

INRMP BMGR East 5-Year Work Plan: FY 2019–2023											
Element <sup>1</sup>	Action Step <sup>2</sup>	Fiscal Year <sup>3</sup>	Funding <sup>4</sup>	Frequency <sup>5</sup>	Partners <sup>6</sup>	Comments	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023
Resource Management											
1, 11	Monitor and control invasive species	Annual	\$50,000	Annual	In-house, Interagency, University	Ongoing monitoring occurs while driving range roads, control measures performed when necessary and appropriate.	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000
1	Monitor vegetation plots in several plant communities	Annual	\$60,000	Annual	In-house, Contractors, Interagency	Each plot is assessed at 5-year intervals.	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000
1	Desert tortoise surveys	1 & 5	\$50,000	Every 5 years	AGFD	Survey new areas and or re-survey known occupied and suitable habitat identified during previous surveys.	\$50,000				\$50,000
1	Raptor management surveys and monitoring	Annual	\$15,000	Annual	In-house, AGFD	Support bald eagle nest watch, golden eagle surveys, raptor surveys, assess potential for powerline electrocution, etc.	\$15,000	\$15,000	\$15,000	\$15,000	\$15,000
1	Bird surveys	1 & 2	\$35,000	Varies	In-house, AGFD	New protocol by Arizona Bird Conservation Initiative; survey 3 consecutive years, pause 5 to 10 years, repeat.			\$35,000	\$35,000	\$35,000
1	Support AGFD surveys for game ungulates	Varies	\$-	Varies by species	AGFD	Support and participate in surveys performed by AGFD.					
1	Support AGFD surveys for gamebirds	Annual	\$-	Annual	AGFD	Support and participate in surveys performed by AGFD.					
1	Collaborate with AGFD to identify and maintain important wildlife connectivity corridors	Annual	\$-	Annual	AGFD	Collaborate with AGFD to identify and maintain important wildlife connectivity corridors.					
1	Kit fox population monitoring	1 & 4	\$5,000	Every 3 years	In-house	Continuation of population monitoring using scent stations.	\$5,000			\$5,000	
1	Bat surveys; evaluate, monitor and protect important bat roosts	Annual	\$50,000	Annual	In-house, AGFD	Various survey techniques: acoustic monitoring, mist netting, roost assessments, guano sampling, etc.	\$25,000	\$25,000	\$25,000	\$25,000	\$25,000
1	Cactus ferruginous pygmy-owl survey (low priority)	1, 3, & 5	\$5,000	Every 2 years	In-house	Low priority: none detected on BMGR East during repeated surveys over past 20 years; marginal habitat.	\$3,000		\$3,000		\$3,000
1	Weather stations and rain gauges	Annual	\$19,000	Annual	In-house	Operate 12 existing remote-access stations, plus 15 rain gauges at specific study locations.	\$19,000	\$19,000	\$19,000	\$19,000	\$19,000
1	Monitor use of wildlife watering sites	Annual	\$15,000	Annual	In-house, AGFD	Continuation of program using wildlife cameras to record usage during summer months; evaluate resulting thousands of photographs to build database of species, abundance, location, etc.	\$15,000	\$15,000	\$15,000	\$15,000	\$15,000
1	Medium and low priority actions as resources allow	Annual	\$10,000	Varies	TBD	Some lower-priority actions may be completed based on adaptive management concerns or availability of resources.	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000
1	Vegetation mapping	3 & 5	\$25,000	Annual	In-house, Interagency, University	Continuation of vegetation mapping project being performed by UA; uses standardized method in use by regional land managers.			\$25,000		\$25,000

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Element <sup>1</sup>	Action Step <sup>2</sup>	Fiscal Year <sup>3</sup>	Funding <sup>4</sup>	Frequency <sup>5</sup>	Partners <sup>6</sup>	Comments	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023
1	Acuña cactus monitoring	Annual	\$50,000	Annual	In-house, AGFD, Contractor	Continuation of Acuña Cactus monitoring, distribution surveys, habitat modeling, etc.	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000
1	Support special studies to address specific management issues, such as invasive species, species of concern, climate change, etc.	Annual	Varies	Annual	In-house, Interagency, University	Supports research proposals developed by universities, AGFD, USGS, or others that address various issues of concern.	\$19,000	\$27,000	\$34,000	\$37,000	\$19,000
1	Implement cultural resource survey and monitoring requirements for INRMP-related actions	2, 5	\$150,000	Annual	In-house, Contractors	Continue surveys along roadways and nearby potential cultural sites in Area B, including recording of camp sites; use resulting information to assess potential adverse effects from INRMP-related activities including motorized access and public use.		\$150,000		\$150,000	
2	Identify and evaluate other possible Special Natural/Interest Areas	3	\$20,000	One time	In-house	Bender Spring and Paradise Well are candidate areas; also contemplating a nature trail in Crater Range.			\$20,000		
11	Habitat restoration*	As needed	\$25,000	Annual	In-house	Active and passive restoration of degraded areas	\$25,000	\$25,000	\$25,000	\$25,000	\$25,000
11	Evaluate benefits and adverse effects of wildlife watering sites	Annual	\$35,000	Annual	In-house, Interagency, University	Perform a holistic review based on previous studies at BMGR and relevant literature, continue water-quality monitoring and develop recommendations for management.	\$35,000	\$35,000	\$35,000	\$35,000	\$35,000
11	Develop and implement procedures to control trespass livestock	Annual	\$55,000	Varies	In-house	Address burgeoning trespass livestock population.	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000
11	Allow for the maintenance and repair of existing water developments*	As needed	TBD	Reoccurs as needed	AGFD	Support AGFD annual maintenance of all waters and redevelopment as required.					
12	Participate and implement actions per the Sonoran Pronghorn Recovery Plan	Annual	\$220,000	Recurring actions	Interagency	Pronghorn recovery actions as stipulated in the Biological Opinion, recovery plan, or as determined by the interagency Recovery Team.	\$220,000	\$220,000	\$220,000	\$220,000	\$220,000
13	Evaluate erosion conditions of range roads; repair or temporarily restrict use*	Annual	\$-	Annual	In-house, Contractor	Annual driving inspection of the most heavily used range roads; secondary and tertiary roads driven at least every 3 years; continue drag road monitoring at 10 sites.					
13	Evaluate erosion problems in specific areas, develop recommendation plans for repair	3	\$150,000	One time	Interagency, University Contractor	Road maintenance practices in many areas are non-sustainable.			\$150,000		
13	Monitor water table levels	Annual	\$-	Annual	In-house	Performed by range operations contractor.					
14	Control excessive fugitive dust at permitted construction sites and recreation activity areas	As required	\$-	TBD	In-house	Performed by range operations contractor as part of recurring maintenance work.					
16	Complete and implement fire management plan	Annual	\$-	One time	In-house	Assess fire risk, implement campfire restrictions as appropriate; maintain firefighting agreement with BLM.					

INRMP BMGR East 5-Year Work Plan: FY 2019–2023											
Element <sup>1</sup>	Action Step <sup>2</sup>	Fiscal Year <sup>3</sup>	Funding <sup>4</sup>	Frequency <sup>5</sup>	Partners <sup>6</sup>	Comments	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023
Motorized Access											
3	Close selected roads to public access where an agency mission or resource protection issues conflict with public use	As required	TBD	As required	In-house	Access restrictions may be imposed due to evolving weapons-safety footprints, natural or cultural resource protection, law enforcement concerns or other management actions.					
Public Use											
4	Assess benefits and effects of establishing designated camping areas and implement a decision based on the findings	Year 5	\$-	One-time	In-house	Not enough information available to make an assessment; existing camp sites are being recorded as part of cultural resources surveys along road corridors.					
5	Revise public visitation maps and rules for public education and recreation use; would inform the public about road restrictions and resource sensitivities	Annual	\$3,000	Annual	In-house, USMC	Annual revisions based on results of area monitoring, with clarifications of rules printed on the reverse sides of the maps.	\$3,000	\$3,000	\$3,000	\$3,000	\$3,000
5	Public outreach	Annual	\$5,000	Annual	In-house	Supports public awareness projects to educate base personnel/public about BMGR cultural resources, natural resources, historic preservation, and conservation activities.	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000
5	Public Use Area Access Program	Annual	\$7,000	Annual	Contractor	Continue using iSportsman for BMGR East public use area access; compile recreation-use statistics, analyze patterns, and identify heavily used areas, and monitor those areas to identify any resource concerns; use vehicle traffic counters to quantify intensity of use at general and specific areas.	\$7,000	\$7,000	\$7,000	\$7,000	\$7,000
5	Law enforcement patrol	Annual	\$-	Annual	AGFD	First CLEO started October 2017; second officer scheduled to arrive November of FY 2019; both CLEOs shall patrol BMGR East and assist with resource protection.					
5	Install signs, gates, and fences to support road infrastructure and public access	Annual	\$5,000	Reoccurs as needed	In-house	Install and maintain signage at range entry points, along perimeters, and at all road intersections.	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000
7	Monitor native wood supplies in high-use areas; restrict wood collection if resource conditions dictate	Year 1	\$-	Recurrs every 5 years	In-house	Use completed cultural resources surveys in Area B to identify high-use areas; assess in Year 1.					
Manage Realty Property											
10	Cooperate with Arizona Department of Transportation (ADOT), BLM, BP, and utility companies regarding proposed actions within existing utility/transportation corridors	Ongoing	\$-	As required	ADOT, BLM, BP	Continue dialogue and partnership with proponent and supporting action agencies.					
10	Coordinate with CE Real Property for maintenance of utilities by responsible agencies in the State Route 85 easement	Ongoing	\$-	As required	In-house	Activities within the right-of-way include operation and maintenance of overhead power lines, buried fiber optic lines, and a Border Patrol checkpoint.					

INRMP BMGR East 5-Year Work Plan: FY 2019–2023											
Element <sup>1</sup>	Action Step <sup>2</sup>	Fiscal Year <sup>3</sup>	Funding <sup>4</sup>	Frequency <sup>5</sup>	Partners <sup>6</sup>	Comments	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023
Perimeter Land Use											
17	Participate in local and regional planning and monitoring land use patterns	As required	\$-	As required	In-house, Interagency	Participate in developing or reviewing environmental assessments or impact statements, resource management plans; serve as DoD clearinghouse for energy development proposals in Arizona.					
17	Monitor illegal immigration, trafficking, and border-related law enforcement to anticipate how BMGR resources may be affected	Ongoing	\$-	Annual	In-house, Interagency	Continue informal coordination with law enforcement authorities and gather anecdotal evidence of border-related impacts.					
BUDGET TOTALS BY YEAR (\$)							576,000	676,000	766,000	726,000	631,000

<sup>1</sup> INRMP Resource Management Element addressed.

<sup>2</sup> Fulfill requirement of Resource Management Element.

<sup>3</sup> Year of funding and completion of action.

<sup>4</sup> Estimate of required funding amount to complete project.

<sup>5</sup> How often action will occur.

<sup>6</sup> Responsible parties for completing the action.

\*May require further NEPA review and/or Section 106 consultation.

Table 10.2: BMGR West 5-Year Action Plan FY 2019–2023.

INRMP BMGR West 5-Year Work Plan: FY 2019–2023											
Element <sup>1</sup>	Action Step <sup>2</sup>	Fiscal Year <sup>3</sup>	Funding <sup>4</sup>	Frequency <sup>5</sup>	Partners <sup>6</sup>	Comments	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023
Resource Management											
1, 12,	FTHL occupancy surveys	Annual	Varies	Annual	In-house, Interagency	Support AGFD in conducting demographic and occupancy surveys as outlined in the Rangewide Management Plan developed by the FTHL Interagency Coordinating Committee.	\$76,500	\$78,030	\$79,591	\$81,182	\$82,806
1	Identify and monitor vegetation plots in several plant communities	TBD	Varies	Annual	In-house	Each plot will be assessed at 5-year intervals.					
1, 11	Monitor and control invasive plant species	Annual	Varies	Annual	In-house, Interagency	Annual monitoring and control of invasive plant species is on-going.	\$42,148	\$43,458	\$44,419	\$45,307	\$46,203
1	Reptile, small mammal, and amphibian surveys and monitoring	2018	Varies	Every 5 years	In-house, Interagency	Establish a repeatable baseline monitoring methodology that will capture the diversity of small mammals, reptiles, and amphibians; develop potential distribution maps captured wildlife; provide recommendations to monitoring efforts and natural resource stewardship.	\$200,000				
1	General bird surveys	TBD	Varies	Every 5 years	In-house, Interagency	New protocol under development.					
1	Surveys for game ungulates	TBD	Varies	Varies by Species	In-house, Interagency	Support and participate in surveys performed by AGFD.					
1	Bat surveys	Annual	In-kind	Annual	In-house, Interagency	Assist AGFD in conducting bat surveys at BMGR-West.					
1	Maintain important wildlife connectivity corridors at BMGR West	Annual	Varies	Varies	In-house, Interagency	Collaborate with AGFD and partner agencies to identify and maintain important wildlife connectivity corridors at BMGR West.					
1	Install and maintain weather stations and rain gauges	TBD	Varies	Varies	In-house	Upgrade existing weather stations to wireless communication with Luke AFB.	\$30,000				
1	Medium and low priority actions as resources allow	Annual	Varies	Varies	TBD	Some lower-priority actions may be completed based on adaptive management concerns or availability of resources.					
1	Support special studies to address specific management issues, such as invasive species, species of concern, climate change, etc.	Annual	Varies	Annual	In-house, Interagency	Supports research proposals developed by universities, AGFD, USGS, or others that address various issues of concern.					
2	Identify and evaluate other possible Special Natural, Interest Areas	Varies	Varies	As needed	In-house	No special interest areas have been proposed since the 2007 INRMP.					
1, 12	Participate in and implement actions per the Sonoran Pronghorn Recovery Plan	Annual	Varies	Annual	In-house, Interagency	Support Sonoran pronghorn recovery actions as stipulated in the Biological Opinion, Recovery Plan, or as determined by the interagency Recovery Team.	\$93,050	\$94,817	\$96,618	\$98,453	\$100,323
13	Examine available engineering management practice that can mitigate erosion	Varies	Varies	One-time	In-house, Interagency	Evaluate possible engineering strategies and designs to prioritize areas most erosion mitigation efforts.					
11	Partner with the BP to identify and implement habitat restoration	Varies	Varies	Annual	In-house, Interagency	Collaborate with local BP offices to implement maintenance and repair best-management practices as outlined in CBP's 2012 Environmental Assessment (Department of Homeland Security, U.S. Customs and Border Protection, and U.S. Border Patrol 2012).					

Table 10.2: BMGR West 5-Year Action Plan FY 2019–2023.

INRMP BMGR West 5-Year Work Plan: FY 2019–2023											
Element <sup>1</sup>	Action Step <sup>2</sup>	Fiscal Year <sup>3</sup>	Funding <sup>4</sup>	Frequency <sup>5</sup>	Partners <sup>6</sup>	Comments	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023
16	Complete and subsequently implement fire management plan	One-time	Varies	One-time	In-house, Interagency	Contract has been awarded and the fire plan is scheduled for completion in 2018.	\$15,682				
1	Range-wide soil map	Years 1,2,3	Varies	One-time	In-house, Interagency	Soil map is being developed.	\$150,000				
1	Aerial imagery for range and base	Year 3	Varies	As needed	In-house, Interagency	Imagery will be collected via piloted and/or autonomous aircraft and/or satellites.			\$125,000		
1	Characterize anthropogenic impacts	Year 3	Varies	As-needed	In-house, Interagency	Use the best imagery, soil, precipitation, and vegetation data available to map recent disturbances that will considerably improve the series of erosion models.					
1	Construct adaptive management strategies for maintaining acceptable limits of change	TBD	Varies	As Needed	In-house, Interagency	Consider existing baseline survey data and regional concerns to determine the need for the implementing of adaptive management strategies.					
14	Control excessive fugitive dust at permitted construction sites and recreation activity areas	As-required	Varies	As Required	In-house	Control fugitive dust as required through NEPA.					
1	Allow maintenance and development of existing water sources supporting wildlife	As Needed	In-kind	As Needed	Interagency	Continue to work with AGFD to monitor and maintain existing network.					
1, 11, 13,14 ,15	Conduct habitat restoration efforts for damaged areas	As Needed	Varies	As Needed	In-house	Continue active and passive restoration of degraded areas.					
1, 11	Support AGFD installation of up to six high-priority wildlife watering sites at BMGR	As Needed	In-kind	As Needed	In-house, Interagency	Determine as needed and as funding is available.					
1-17	Maintain an adequately trained staff to accomplish conservation goals and objectives	As Needed	TBD	As Needed	In-house	Ensure that sufficient numbers of professionally and adequately trained natural resource management personnel and conservation law enforcement personnel are available and assigned responsibility to manage their installations' natural resources.	\$20,400	\$20,808	\$21,224	\$21,684	\$22,081
Motorized Access											
1, 5, 6, 7, 8, 9, 11	Develop a plan for determining the limits-of-acceptable change for recreational, natural, and cultural resources	TBD	Varies	As Needed	In-house, Interagency	Use baseline survey data to determine the degree of change and develop a plan appropriate to the findings.					
3	Close selected roads to public access where an agency mission or resource protection issues conflict with public use	TBD	Varies	As Needed	In-house, Interagency	Determine as needed and as funding is available.					
3	Evaluate site-specific proposals to assess the need for and potential impacts of approving additional roads for agency purposes	As Needed	TBD	As Needed	In-house	Determine as needed.					
3, 5	Install signs, gates, and fences to support road infrastructure and public access	As Needed	TBD	As Needed	In-house	Install signs as needed to identify restricted areas, range boundaries, range entry points, along perimeters, road intersections, and ground support areas.					

Table 10.2: BMGR West 5-Year Action Plan FY 2019–2023.

INRMP BMGR West 5-Year Work Plan: FY 2019–2023											
Element <sup>1</sup>	Action Step <sup>2</sup>	Fiscal Year <sup>3</sup>	Funding <sup>4</sup>	Frequency <sup>5</sup>	Partners <sup>6</sup>	Comments	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023
Public Use											
4, 5	Maintain the recreational use database to determine public use, roads, and compliance in support of natural resource management actions	Annual	Varies	Annual	In-house	Permits office maintains records of range permits issued monthly.					
4	Assess benefits and effects of establishing designated camping areas for adaptive management of public use areas	TBD	Varies	As Needed	In-house	Continue to collect information from visitor passes and CLEO records/observations/corrective actions to determine the possible impacts created from public use.					
5	Revise and maintain visitor map	TBD	Varies	As Needed	In-house	A surplus of the 2008 BMGR West informational brochure/map is available through the permitting office or Range Management Department; the brochure/map outlines public use rules and open/closed areas; publication of a revised map will be completed when existing sources are exhausted.	\$3,000	\$3,000	\$3,000	\$3,000	\$3,000
5	Retain a minimum of four full-time CLEO positions	Annual	TBD	Annual	In-house	Four full-time Conservation Law Enforcement Officers have been filled.					
5	Public outreach	Annual	Varies	Annual	In-house	Support public awareness efforts to educate MCAS Yuma employees and the Public concerning natural and cultural resources, historic preservation, and conservation activities.					
5	Compile recreation-use statistics, analyze patterns, ascertain where use is heavy to identify areas of resource concern	Annual	TBD	Annual	In-house	This is on-going and closely monitored.					
8	Evaluate the effects of non-game species collection on wildlife, habitat, and other resources; limit or restrict collection activities within the authority of state law	Annual	In-kind	Annual	In-house, Interagency	Determine as needed and as funding is available.					
Manage Realty Property											
10, 17	Cooperate with ADOT, BP, and utility companies regarding proposed actions within existing utility/transportation corridors	As Needed	Varies	As Needed	Interagency	Continue an open dialogue with partnering agencies at BEC and IEC meetings; the RMD works in cooperation with the BEC, ICC, MOG, Pronghorn recovery Team, and local, state, and federal governments to revise and improve management actions and policies.					
Perimeter Land Use											
17	Monitor illegal immigration, trafficking, and border-related law enforcement to anticipate how BMGR resources may be affected	As Needed	Varies	As Needed	In-house, Interagency	Continue coordinating with law enforcement authorities and sharing of anecdotal evidence of border-related impacts.					
BUDGET TOTALS BY YEAR (\$)							630,780	240,113	369,852	249,626	254,413

<sup>1</sup> INRMP Resource Management Element addressed

<sup>2</sup> Fulfill requirement of Resource Management Element

<sup>3</sup> Year of funding and completion of action

<sup>4</sup> Estimate of required funding amount to complete project

<sup>5</sup> How often action will occur

<sup>6</sup> Responsible parties for completing the action

\*May require further NEPA review and/or Section 106 consultation

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## **APPENDIX A      BMGR EAST AND WEST 2012–2017 INRMP MANAGEMENT ELEMENTS AND STATUS OF ACTION ITEMS**

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The action items proposed for BMGR East (Table A.1) and West (Table A.2) in the 2012 BMGR INRMP for 2012–2017, and their status/progress as of early 2018, are provided in Appendix A. Action items are listed by management element. Note that not every management element has proposed action items in every five-year INRMP cycle.

Table A.3: Action items, listed by management element number and title, proposed for BMGR East in the 2012–2017 INRMP, and action item status/progress as of early 2018.

Action Plan Item	Status	Progress by 2018
<b>1—Resource Inventory and Monitoring</b>		
Monitor and control invasive species	Ongoing	Initiated cleaning of drags to prevent spread of invasive species, mapping of invasive species, and physical and chemical removal of invasive species
Monitor 92 vegetation plots in several plant communities	Ongoing	Plots have been checked at five-year intervals and will continue to be checked on the same schedule
Desert tortoise surveys	Ongoing	Landscape-level habitat model developed to determine likelihood of desert tortoise presence (Grandmaison 2012)
Raptor management surveys and monitoring	Ongoing	AGFD 2013–2015 study to evaluate airborne military activities on golden eagles, breeding bird survey (2012–2014), avian species survey conducted by Tunista Service and Chiulista Services 2012–2016 for the Annual BASH Summary Report
Bird surveys	Ongoing	Breeding bird survey (2012–2014), avian species survey conducted by Tunista Service and Chiulista Services 2012–2016 for the Annual BASH Summary Report, total of 1253 bird surveys from 2012–2016
Support AGFD surveys for game ungulates	Ongoing	Annual deer surveys; bighorn sheep surveys (2014, 2017)
Support AGFD surveys for gamebirds	Ongoing	Game bird surveys conducted on an annual basis
Collaborate with AGFD to identify/maintain important wildlife connectivity corridors at BMGR East	Ongoing	Desert tortoise research identified wash systems as important movement corridors
Kit fox population monitoring	Ongoing	Completed kit fox population monitoring using scent stations (2013, 2016)
Bat surveys; evaluate, monitor and protect important bat roosts	Ongoing	Bat monitoring study (Mixan et al. 2016), 2012–2014 study (Piorkowski et al.) to determine potential conflict with bats and military mission
CFPO survey (low priority)	Ongoing	Repeated surveys spanning the past 20 years on The BMGR East
Weather stations and rain gauges	Ongoing	BMGR East implemented network of communication grade weather systems in 2011; BMGR West uses manual-download weather stations
Monitor use of wildlife waters	Ongoing	Wildlife cameras used to record species which use wildlife waters (2008–2012)
Medium and low priority actions as resources allow	Not initiated	
Vegetation mapping	Ongoing	The BMGR West completed vegetation mapping in 2014 (Malusa and Sundt 2015), The BMGR East initiated mapping in 2003 and plans to complete mapping by FY 2019
Support special studies to address specific management issues, such as invasives, species of concern, climate change, etc.	Ongoing	Continuing Research of Impacts associated with Drag Roads
Implement cultural resource survey and monitoring requirements for INRMP – related actions	Ongoing	Completed cultural resources survey for a renewable energy project for MCAS Yuma in 2013 and a number of archeological surveys at BMGR West from 2013–2016
<b>2—Special Natural/Interest Areas</b>		

Identify and evaluate other possible Special Natural / Interest Areas	Not initiated	Project to be initiated in 2021
<b>3—Motorized Access and Non-Roaded Area Management</b>		
Close selected roads to public access where an agency mission or resource protection issues conflict with public use	Ongoing	Access restrictions have been imposed in the past due to security, safety, cultural or environmental reasons and will continue to be imposed as required
<b>4—Camping and Stay Limits</b>		
Assess benefits and effects of establishing designated camping areas and implement a decision based on findings	Initiated/incomplete	Documented known camping areas to detect changes by repeat photography
<b>5—Recreation Services and Use Supervision</b>		
Revise public visitation maps and rules for public education and recreation use; would inform the public about road restrictions and resource sensitivities	Ongoing	Annual process which has been conducted for a number of years and will continue to as restrictions change
Public outreach	Ongoing	Public awareness projects have been used to educate base personnel and the public about activities at The BMGR
Hire law enforcement officers to be retained and dedicated to the BMGR East; interim measure consists of contract security guards with detention authority	Initiated/incomplete	One CLEO started in October 2017 and a second will begin in FY 2019
Install signs, gates, and fences to support road infrastructure and public access	Ongoing	Ongoing annual process which will continue to update signage as public access and road infrastructure changes
Compile recreation use statistics; analyze patterns, identify heavily used areas; monitor those areas to identify and resource concerns	Initiated/incomplete	Deployed traffic counters at gate entry areas; new iSportsman application will aid in recreation use statistics
<b>7—Wood cutting, Gathering, and Firewood Use, and Collection of Native Plants</b>		
Monitor native wood supplies in high-use areas; restrict wood collection if resource conditions dictate	Ongoing	Documented known camping areas to detect changes by repeat photography
<b>10—Utility/Transportations Corridors</b>		
Cooperate with ADOT, BLM, U.S. Border patrol, and utility companies regarding proposed actions within existing utility/transportation corridors	Ongoing	Cooperate with partners on all utility/transportation corridors
Coordinate with CE Real Property to restrict future utility and transportation corridors to the existing State Route 85 and railroad rights of way	Ongoing	Coordinate to ensure proper procedures are implemented
<b>11—General Vegetation, Wildlife, Wildlife Habitat, and Wildlife Waters</b>		
Monitor and control invasive species	Ongoing	Initiated cleaning of drags to prevent spread of invasive species, mapping of invasive species, and physical and chemical removal of invasive species
Habitat restoration <sup>1</sup>	Ongoing	Implement as needed and based on priority level and type of threat
Evaluate benefits and adverse effects of wildlife waters	Ongoing	Water quality tested by USGS (2013–2016), camera trapping program (2008–2012)
Develop and implement procedures to control trespass livestock	Ongoing	Fences have been established around the BMGR perimeter

Allow for the maintenance and repair of existing water developments <sup>1</sup>	Ongoing	AGFD has constructed catchments and refills them during periods of extreme drought
<b>12—Special Status Species</b>		
Participate and implement actions per the Sonoran Pronghorn Recovery Plan	Ongoing	Established semi-captive breeding program at the Cabeza Prieta NWR (2003) and at Kofa NWR (2011); established a second population within historical range at BMGR East, monitoring program established on ranges when EOD operations or weapon use is expected
<b>13—Soil and Water Resources</b>		
Evaluate erosion conditions of range roads; repair or temporarily restrict use <sup>1</sup>	Ongoing	USGS developed erosion vulnerability model from vehicle use at BMGR West (2014), implemented 3D cameras to monitor erosion across range
Evaluate erosion problems in specific areas, develop plans for repair	Ongoing	Installed hay bales and straw waddles to reduce erosion
Monitor water table levels	Ongoing	Annual Gila Bend contractor requirement
<b>14—Air Resources</b>		
Control excessive fugitive dust at permitted construction sites and recreation activity areas	Ongoing	All county air quality regulations are followed
<b>16—Wildfire Management</b>		
Complete and subsequently implement Fire Management Plan	Initiated/incomplete	56 RMO to complete Wildland Fire Management Plan in 2018
<b>17—Perimeter Land Use, Encroachment, and Regional Planning</b>		
Participate in local and regional planning and monitoring land use patterns	Ongoing	2018 Public Report provides opportunity for public input, public allowed to participate in development or review of environmental assessments or impact statements
Monitor illegal immigration, trafficking, and border-related law enforcement to anticipate how the BMGR resources may be affected	Ongoing	BEC meetings held six times a year regarding illegal traffic and patrol impacts on natural resources in the BMGR region; law enforcement required to complete the Range Access and Safety Training Program

<sup>1</sup> May require further NEPA review and/or Section 106 consultation.

Table A.4: Action items, listed by management element number and title, proposed for BMGR West in the 2012–2017 INRMP, and action item status/progress as of early 2018.

Action Plan Item	Status	Progress by 2018
<b>1—Resource Inventory and Monitoring</b>		
FTHL Joint Strike Fighter Impact Study	Completed	This action is completed
Complete range wide vegetation map	Completed	This action is completed
Identify and monitor vegetation plots in several plant communities	Ongoing	Working with National Park Service to control invasive species
Reptile, small mammal, and amphibian surveys and monitoring	Ongoing	(1) Establish a repeatable baseline monitoring methodology that will capture the diversity of small mammals, reptiles, and amphibians; (2) develop potential distribution maps captured wildlife, and; (3) provide recommendations to monitoring efforts and natural resource stewardship (will continue through FY 2018, 2019)
General bird surveys	Not initiated	New protocol under development
Bat surveys	Ongoing	Assist AGFD in conducting bat surveys at BMGR-West
Collaborate with AGFD to identify and maintain important wildlife connectivity corridors at BMGR West	Not initiated	Collaborate with AGFD and partner agencies to identify and maintain important wildlife connectivity corridors at BMGR West
Installation and maintenance of weather stations and rain gauges	Ongoing	Upgrade existing weather stations to wireless communication with Luke AFB
Support special studies to address specific management issues, such as invasives, species of concern, climate change, etc.	Ongoing	This is an ongoing action
Implement cultural resource survey and monitoring requirements for INRMP—related actions	Ongoing	Cultural resource surveys and monitoring will continue
Develop and implement systems to monitor the effectiveness of compliance actions	Ongoing	This is an ongoing action
Develop a plan for determining the limits-of-acceptable change for recreational, natural, and cultural resources	Not initiated	Use baseline survey data to determine the degree of change and develop a plan appropriate to the findings
Construct adaptive management strategies for maintaining acceptable limits of change	Not initiated	Consider existing baseline survey data and regional concerns to determine the need for the implementing of adaptive management strategies
Annual FTHL occupancy surveys	Ongoing	These surveys will continue
<b>3—Motorized Access and Non-Roaded Area Management</b>		
Temporarily close selected roads to public access where an agency mission or resource protection issues conflict with public use	Ongoing	This action is ongoing and as needed
Evaluate site-specific proposals for future need and impacts of developing additional roads for agency purposes <sup>1</sup>	Ongoing	At this time there are no plans for any new roads for agency use
Implement site specific planning for two bypass roads that would reroute vehicle traffic around the northwest corner of the Cabeza Prieta NWR	Completed	This action is completed
<b>4—Camping and Stay Limits</b>		
Assess benefits and effects of establishing designated camping areas and implement a decision based on the findings	Ongoing	Continue to collect information from visitor passes and CLEO records/observations/corrective actions to determine the possible impacts created form public use

Action Plan Item	Status	Progress by 2018
<b>5—Recreation Services and Use Supervision</b>		
Develop a plan for determining the limits-of-acceptable change for recreational, natural, and cultural resources	Not initiated	Use baseline survey data to determine the degree of change and develop a plan appropriate to the findings
Revise visitor map	Ongoing	This action is scheduled during the next five years
Public outreach	Ongoing	Support public awareness efforts to educate MCAS Yuma employees and the public concerning natural, and cultural resources, historic preservation, and conservation activities
Install signs, gates and fences to support road infrastructure and public access	Ongoing	Install signs as needed to identify restricted areas, range boundaries, range entry points, along perimeters, road intersections, and ground support areas
Compile recreation use statistics; analyze patterns, identify heavily used areas; monitor those areas to identify and resource concerns	Ongoing	This is on-going and closely monitored
<b>7—Wood cutting, Gathering, and Firewood Use, and Collection of Native Plants</b>		
Develop a plan for determining the limits-of-acceptable change for recreational, natural, and cultural resources	Not initiated	Use baseline survey data to determine the degree of change and develop a plan appropriate to the findings
<b>8— Hunting</b>		
Develop a plan for determining the limits-of-acceptable change for recreational, natural, and cultural resources	Not initiated	Use baseline survey data to determine the degree of change and develop a plan appropriate to the findings
<b>10—Utility/Transportations Corridors</b>		
Cooperate with ADOT, U.S. Border Patrol, and utility companies regarding proposed actions within existing utility/transportation corridors	Ongoing	Continue an open dialogue with partnering agencies at BEC and IEC meetings, the RMD works in cooperation with the BEC, ICC, MOG, Pronghorn Recovery Team, and local, state, and federal governments to revise and improve management actions and policies
<b>11—General Vegetation, Wildlife, Wildlife Habitat, and Wildlife Waters</b>		
Develop a plan for determining the limits-of-acceptable change for recreational, natural, and cultural resources	Not initiated	Use baseline survey data to determine the degree of change and develop a plan appropriate to the findings
Allow maintenance and development of existing water sources supporting wildlife	Ongoing	Continue to work with AGFD to monitor and maintain existing network of wildlife waters at BMGR-West
Partner with U.S. Border Patrol to identify and implement the habitat restoration	Ongoing	Collaborate with local U.S. Border Patrol offices to implement maintenance and repair best management practices as outlined in CBP’s 2012 EA (Department of Homeland Security 2012, <a href="https://nemo.cbp.gov/sbi/az_timr_final_ea.pdf">https://nemo.cbp.gov/sbi/az_timr_final_ea.pdf</a>
Support AGFD installation of up to a total of six high-priority wildlife waters <sup>1</sup>	Ongoing	Determine as needed and available funding
<b>12—Special Status Species</b>		
Participate and implement actions per the Sonoran Pronghorn Recovery Plan	Ongoing	Support Sonoran pronghorn recovery actions as stipulated in the Biological Opinion, Recovery Plan, or as determined by the Interagency Recovery Team

Action Plan Item	Status	Progress by 2018
<b>13—Soil and Water Resources</b>		
Comprehensive erosion assessment to prioritize the sites with severe erosion, and examine available engineering management practice that can mitigate erosion	Ongoing	This is on-going and closely monitored
<b>16—Wildfire Management</b>		
Complete and subsequently implement fire management plan	Ongoing	BMGR-West Fire Management Plan will be completed in FY 2018
<b>17—Perimeter Land Use, Encroachment, and Regional Planning</b>		
Monitor illegal immigration, trafficking, and border-related law enforcement to anticipate how the BMGR resources may be affected	Ongoing	Continue coordinating with law enforcement authorities and sharing of anecdotal evidence of border-related impacts

# LUKE AIR FORCE BASE

## INTEGRATED NATURAL RESOURCES MANAGEMENT PLAN

August 2018



Prepared for:  
U.S. Department of the Air Force, Luke Air Force Base

In cooperation with:  
U.S. Department of the Interior, Fish and Wildlife Service,  
and  
Arizona Game and Fish Department



Prepared by:  
Colorado State University  
Center for Environmental Management of Military Lands

**U. S. AIR FORCE INTEGRATED NATURAL RESOURCES  
MANAGEMENT PLAN**

**Luke Air Force Base, Auxiliary Field 1,  
And  
Fort Tuthill  
Arizona**



*(See INRMP signature pages for plan approval date)*

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***About This Plan***

This installation-specific environmental management plan is based on the U.S. Air Force's (USAF) standardized Integrated Natural Resources Management Plan (INRMP) template. This INRMP has been developed according to the Sikes Act Improvement Act (16 U.S. Code § 670 et seq.) in cooperation with applicable stakeholders, which may include Sikes Act cooperating agencies and/or local equivalents, to document how natural resources will be managed. Non-U.S. territories will comply with applicable Final Governing Standards. Where applicable, external resources, including Air Force Instructions; USAF Playbooks; and federal, state, local, Final Governing Standards, biological opinions, and permit requirements, are referenced herein.

Certain sections of this INRMP begin with standardized, USAF-wide "common text" language that addresses USAF and Department of Defense policies and federal requirements. This common text language is restricted from editing to ensure that it remains standard throughout all plans. Immediately following the USAF-wide common text sections are installation sections. The installation sections contain installation-specific content to address local and/or installation-specific requirements. Installation sections are unrestricted and are maintained and updated by USAF environmental Installation Support Sections and/or installation personnel.

*NOTE: The terms 'Natural Resources Manager' (NRM) and Point of Contact (POC) are used throughout this document to refer to the installation person responsible for the natural resources program, regardless of whether this person meets the qualifications within the definition of a natural resources management professional in U.S. Department of Defense (DoD) Instruction 4715.03, with change 1 (DoD 2017b).*

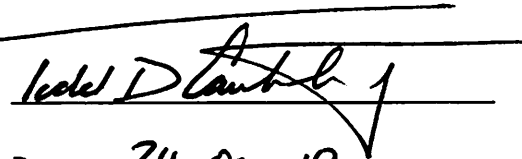
**REVIEW AND UPDATE OF THE  
INTEGRATED NATURAL RESOURCES MANAGEMENT PLAN  
2018-2023**

**Luke Air Force Base  
Auxiliary Field 1  
Fort Tuthill  
Coconino and Maricopa Counties, Arizona**

**APPROVAL**

This Integrated Natural Resources Management Plan was developed by the United States Air Force – Luke Air Force Base in cooperation with the United States Department of Interior, Fish and Wildlife Service and the Arizona Game and Fish Department. The signature below indicates concurrence with and acceptance of the following document. This plan has been prepared pursuant to the Sikes Act Improvement Act of 1998 (U.S. Code § 670a et seq., as amended through 2014).

Todd D. Canterbury  
Brigadier General, USAF  
Commander, 56th Fighter Wing  
Luke Air Force Base, Arizona

  
Date: 24 Oct 18


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Amy Lueders  
Director, Southwest Region  
U.S. Fish and Wildlife Service

  
\_\_\_\_\_  
Date: Oct. 8, 2018

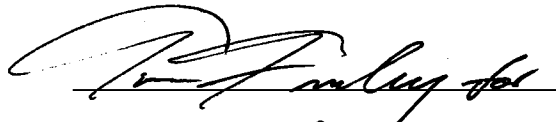
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Ty E. Gray  
Director  
Arizona Game and Fish Department

  
Date: 8-23-18

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**ACRONYMS**


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<b>ADA</b>	Arizona Department of Agriculture
<b>AF</b>	Air Force
<b>AFAF</b>	Air Force Auxiliary Field
<b>AFB</b>	Air Force Base
<b>AFCEC</b>	Air Force Civil Engineer Center
<b>AFI</b>	Air Force Instruction
<b>AZAGFD</b>	Arizona Game and Fish Department
<b>AGL</b>	Above-Ground Level
<b>AHAS</b>	Avian Hazard Advisory System
<b>ABSL</b>	Above Mean Sea Level
<b>APHIS</b>	Animal Planet Health Inspection Services
<b>AUX-1</b>	Auxiliary Airfield 1
<b>AZ</b>	Arizona
<b>BASH</b>	Bird/Wildlife or Bird/Animal Aircraft Strike Hazard
<b>BMGR</b>	Barry M. Goldwater Range
<b>BMP</b>	Best Management Practice
<b>CEIE</b>	Civil Engineer Environmental Element
<b>CES</b>	Civil Engineer Squadron
<b>CRP</b>	Comprehensive Range Plan
<b>DoD</b>	U.S. Department of Defense
<b>DoDI</b>	U.S. Department of Defense Instruction
<b>EIAP</b>	Environmental Impact Analysis Process
<b>EIS</b>	Environmental Impact Statement
<b>EMS</b>	Environmental Management System
<b>EO</b>	Executive Order
<b>ESA</b>	Endangered Species Act
<b>ESM</b>	Environmental Sciences Management
<b>ESRI</b>	Environmental Systems Research Institute
<b>FW</b>	Fighter Wing
<b>FY</b>	Fiscal Year
<b>GEM</b>	Golf Course Environmental Management
<b>GIS</b>	Geographic Information System
<b>ICRMP</b>	Integrated Cultural Resources Management Plan
<b>IDP</b>	Installation Development Plan
<b>INRMP</b>	Integrated Natural Resources Management Plan
<b>IPM</b>	Integrated Pest Management
<b>IPMP</b>	Integrated Pest Management Plan
<b>ISWMP</b>	Integrated Solid Waste Management Plan
<b>MBTA</b>	Migratory Bird Treaty Act
<b>MCAS</b>	Marine Corps Air Station
<b>MOU</b>	Memorandum of Understanding
<b>MWh</b>	Megawatt hours
<b>NEPA</b>	National Environmental Policy Act
<b>NIPRNet</b>	Non-classified Internet Protocol Router Network
<b>NRM</b>	Natural Resource Manager
<b>POC</b>	Point of Contact
<b>RMO</b>	Range Management Office

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***ACRONYMS***

<b>SGCN</b>	Species of Greatest Conservation Need
<b>SWPP</b>	Storm Water Pollution Prevention Plan
<b>TTW</b>	Tactical Training Wing
<b>USACE</b>	U.S. Army Corps of Engineers
<b>USAF</b>	U.S. Air Force
<b>USDA</b>	U.S. Department of Agriculture
<b>USFWS</b>	U.S. Fish and Wildlife Service
<b>WWTP</b>	Waste Water Treatment Plant

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## EXECUTIVE SUMMARY

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This Integrated Natural Resources Management Plan (INRMP) provides guidance for the management of natural resources at Luke Air Force Base (AFB), Auxiliary Field 1 (AUX-1), and Fort Tuthill, Arizona. It is a planning tool that instructs managers to take into account an installation's natural resources in all potential undertakings on its facilities. The objective is to ensure the protection and conservation of natural resources at these facilities in compliance with all applicable laws, regulations, and policies relating to natural resources management. This INRMP serves as a Cooperative Agreement between the U.S. Air Force (USAF), U.S. Fish and Wildlife Service (USFWS), and Arizona Game and Fish Department (AGFD) for approval by the participants in order to establish agreement on recommendations.

The requirements for preparation of this INRMP are derived from the Sikes Act, as most recently amended by the Sikes Act Improvement Act (16 U.S. Code 670 et seq.) (hereafter referred to as the Sikes Act) and the implementing Memorandum of Understanding between the U.S. Department of Defense and the U.S. Department of Interior (1978); Fish and Wildlife Coordination Act (16 U.S. Code § 661 et seq.); Air Force Policy Directive 32-70, *Environmental Quality* (USAF 1994); and Air Force Instruction 32-7064, with change 2, *Integrated Natural Resources Management* (USAF 2016a).

The last INRMP for these facilities to receive approval was signed in 2001. Recent iterations have been presented to the AGFD and USFWS for signature, but outdated wildlife and wildlife habitat information resulted in a non-concurrence determination. The most recent vegetation, wildlife, and wildlife habitat surveys are listed below. During all site visits, an effort was made to assess the probability of special-status species (i.e., federal or state listed species) occurring at the three facilities.

- 1994 inventory of vegetation, wildlife, and wildlife habitat at Luke AFB, AUX-1, and Fort Tuthill
- 1994 field reconnaissance of Luke AFB was accomplished 17–18 October
- 1994 field reconnaissance of AUX-1 was conducted 18 October 1994 and 6 December 2013 by the 56th Range Management Office (56 RMO)/Environmental Services Management
- Fort Tuthill observations were made May–October 2001

During the past wildlife and habitat surveys, no federal or state protected species were detected. To determine whether this is still the case, Luke AFB has programmed targeted, threatened, and endangered species surveys, for both flora and fauna, on all three parcels. Surveys are scheduled to occur during the next five-year planning period covered by this INRMP, 2018–2023. Surveys will result in a habitat characterization map, survey maps, a habitat assessment characterizing the quality and quantity of habitat available to federal or state protected species and conclusions regarding the presence or absence of protected species. During each annual review, this INRMP will be updated with survey results as they become available.

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## CHAPTER 1 OVERVIEW AND SCOPE

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### 1.1 Purpose and Scope

Luke Air Force Base (AFB) is located in Glendale, Arizona, just west of Phoenix, and occupies nearly 4,800 acres of land, (Figure 1.1). Luke AFB is home to the 56th Fighter Wing (56 FW), the largest FW in the U.S. Air Force (USAF) and the only active-duty F-16 training wing. Each year, the base supports training for more than 280 active-duty, Guard and Reserve F-16 pilots and more than 345 maintenance-crew chiefs. On 21 May 2015, Luke AFB training its first class for the F-35 mission. The F-35 is the USAF's latest generation fighter that will replace its aging fleet of F-16 Fighting Falcons and A-10 Thunderbolt IIs. Luke AFB also supports more than 5,500 military and civilian employees on base, and approximately 6,700 family members and 65,000 military retirees who live in the Phoenix area.

Auxiliary Field 1 (AUX-1) is a 1,105-acre inactive airfield located 13 miles northwest of Luke AFB (Figure 1.1). The airfield is used for low-approach, instrument flight training under visual flight rules during daytime training only. Approximately 12,000 operations are performed annually.

Fort Tuthill is located approximately 150 miles north of Luke AFB and 2 miles south of Flagstaff in northern Arizona, adjacent to Fort Tuthill County Park (Figure 1.1). Fort Tuthill is a 14-acre recreational and lodging facility for active-duty personnel from any branch of the U.S. Armed Services.

The 56 FW also has purview over the Barry M. Goldwater Range (BMGR) East and the Gila Bend Air Force Auxiliary Field (AFAF). The natural resources and management activities of those lands are described in the BMGR INRMP (see Volume 1) and in the installation overview of Marine Corps Air Station Yuma (see Volume 3), which is the managing agency for the BMGR West portion of the range. A brief discussion of the training activities that occur at BMGR East is provided in Section 2.1 *Installation Overview* of this INRMP.

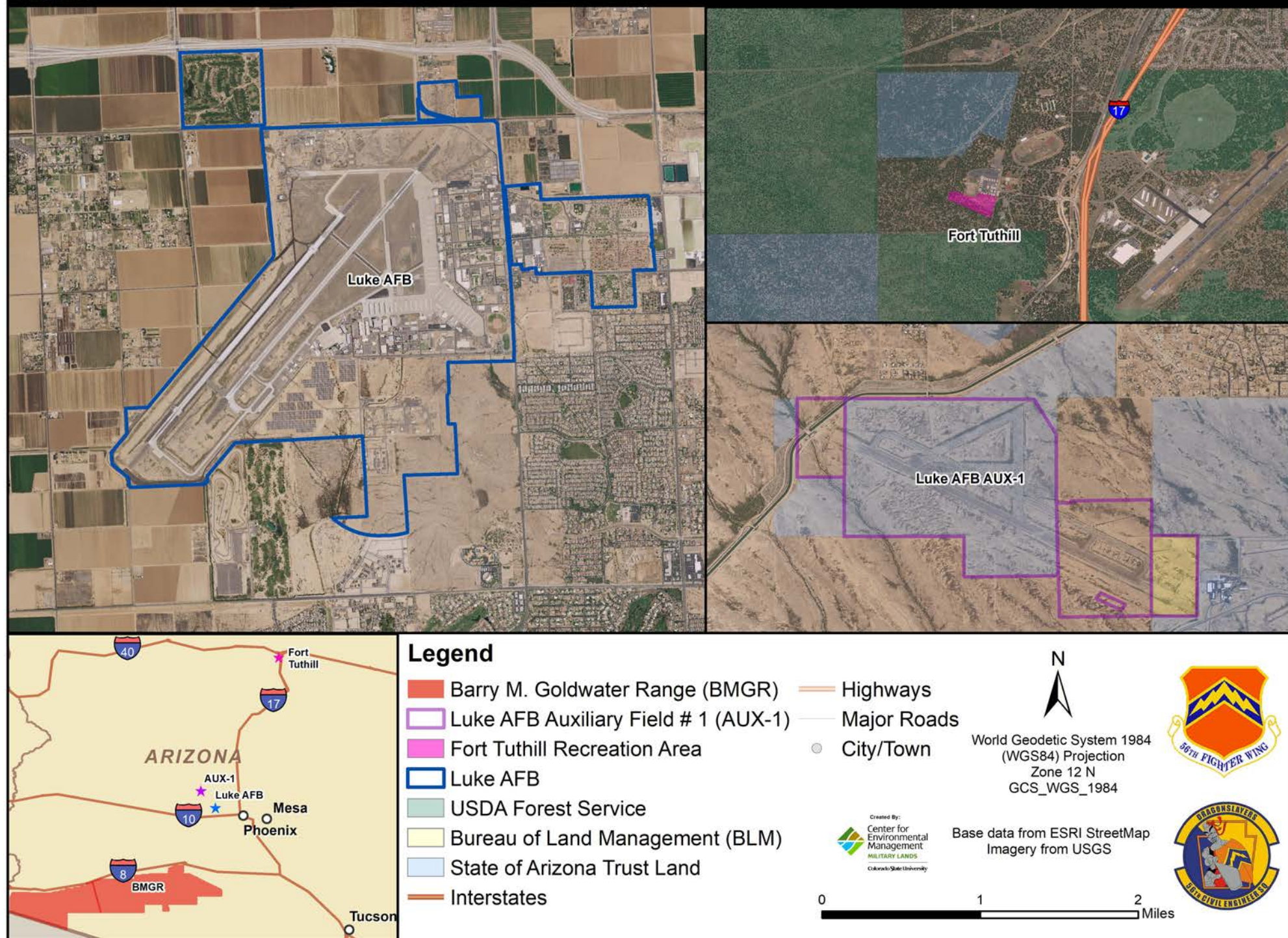
The resources of Luke AFB, AUX-1, and Fort Tuthill are used for living, working, and recreating. For these activities to take place, multiple-use coordination of facilities and management plans are required. The purpose of the INRMP is to serve as the road map for resource management and as the guiding document for USAF planners, implementers of mission activities, and resource managers.

### 1.2 Management Philosophy

Resources under the control of Luke AFB will be managed to support the military mission while practicing the principles of multiple-use and sustainability. The conservation of natural resources and the military mission need not and shall not be mutually exclusive. All installation decision-makers and commanders should be kept informed of the conditions of resources, the objectives of resources management, and potential or actual conflicts between mission activities and management plans.

**Figure 1.1: General Location and Surrounding Land Ownership**

Luke AFB

**2018-2023 Integrated Natural Resource Management Plan (INRMP)**

U.S. Department of Defense Instruction (DoDI) 4715.03, *Natural Resources Conservation Program* (DoD 2017b) outlines policy, assigns responsibilities, and prescribes procedures for the integrated management of natural and cultural resources on property under Department of Defense (DoD) control. This instruction requires installations to incorporate the principles of an ecosystem-based, multiple-species management approach that supports present and future mission requirements while preserving ecological integrity. Ecosystem-based management considers the environment as a complex system functioning as a whole, which takes into account both people and their social and economic needs, and is adaptable to complex and changing requirements. Ecosystem-based management principles are best realized through the engagement and formation of local and regional partnerships that benefit the goals and objectives of this INRMP. DoD ecosystem-based management guidelines are intended to promote/protect natural processes, but do not preclude intervention with active management deemed necessary to address issues, such as invasive species, endangered species recovery, or barriers to wildlife movement inside or outside of the installation.

### 1.3 Authority

The Sikes Act Improvement Act (16 U.S. Code [U.S.C.] § 670 et seq.) (hereafter referred to as the Sikes Act) stipulates that, to the extent consistent with the military use of Luke AFB, Fort Tuthill, and AUX-1, the INRMP must provide for wildlife and land management, wildlife-oriented recreation, wildlife habitat enhancement or modification, and wetland conservation. Guidance for implementing the Sikes Act on USAF property is provided by DoDI 4715.03 and U.S. Air Force Instruction (AFI) 32-7064 (DoD 2017b, USAF 2016a).

In accordance with the Sikes Act, INRMPs are to be reviewed to operation and effect on a regular basis, but not less than every five years (16 U.S.C. 670a (b)(2)). This requirement reflects the fact that military activities, natural resources protection and conservation needs, and public access opportunities and patterns are likely to change over time and there must be a mechanism for adapting an INRMP to changing conditions if the plan is to provide for effective management.

This INRMP was prepared in compliance with the Sikes Act and as a cooperative effort between the U.S. Fish and Wildlife Service (USFWS) and the Arizona Game and Fish Department (AGFD). It sets forth a single unified management philosophy for the protection, conservation, use, and management of resources at Luke AFB, AUX-1, and Fort Tuthill. In addition, the INRMP was developed in an interdisciplinary manner through coordination with individuals from various disciplines. They include pest control, wildlife biology, community planning and landscape planning, and maintenance. All management strategies will be monitored and adjusted as needed. All installation personnel, both civilian and military, will act responsibly in the public interest as they manage the land and resources that are an integral part of the installation. There shall be a conscious and active concern for the inherent value of resources in installation decisions and actions.

### 1.4 Integration with Other Plans

The INRMP is a living document that integrates component plans in a manner that fully supports all aspects of resource management in support of the mission. AFI 32-7062, *Comprehensive Planning*

(USAF 2017c) lists the responsibilities and requirements for comprehensive planning and describes procedures for developing, implementing, and integrating an Installation Development Plan (IDP) with activity management plans, including this INRMP. The Luke AFB IDP, developed in April 2014, establishes goals and objectives to more efficiently and effectively facilitate mission accomplishments and accommodate new missions. Goal five of the IDP is to promote environmental stewardship by ensuring continued compliance with this INRMP.

In addition, INRMPs often incorporate subordinate plans that address installation actions, such as the Integrated Pest Management Plan (IPMP) (Luke AFB 2015), Golf Environmental Management (GEM) (U.S. Air Force Center for Engineering and the Environment 2011), Bird/Wildlife Aircraft Strike Hazard (BASH) Plan (56 FW 2013), and the Integrated Cultural Resources Management Plan (ICRMP). These plans are referenced throughout this INRMP (Luke AFB 2017).

## CHAPTER 2 INSTALLATION PROFILE

### 2.1 Installation Overview

Table 2.1: Installation profile.

<b>Office of Primary Responsibility</b>	The U.S. Air Force Civil Engineer Center (AFCEC) Nellis Installation Support Section serves as the office of primary responsibility for this plan. This INRMP will be reviewed annually by the Nellis Installation Support Section Natural Resource Manager (NRM), and updated as needed.
<b>Natural Resources Manager/ Point of Contact (POC)</b>	56th Civil Engineer Squadron/Civil Engineer Environmental Element (56 CES/CEIE) Building 302 Luke AFB, AZ 85309
<b>State and/or Local Regulatory POCs</b>	Field Supervisor USFWS, Ecological Services 9828 North 31st Avenue C #3 Phoenix, AZ 85052-2517 602-242-0210  Region VI Regional Supervisor Arizona Game and Fish Department 5000 W. Carefree Highway Phoenix, AZ 85086-5000 602-942-3000
<b>Total Acreage Managed by Installation</b>	Luke AFB—4,842 acres AUX-1—1,105 acres Fort Tuthill—14.5 acres
<b>Biological Opinions</b>	N/A
<b>NR Programs</b>	<ul style="list-style-type: none"> <li>• Integrated Pest Management</li> <li>• Bird/Wildlife Aircraft Strike Hazard (BASH) Program</li> <li>• Cultural Resources Management Program</li> </ul>

Luke AFB (Table 2.1, Figure 2.1) is located in Maricopa County, Arizona, approximately 18 miles northwest of the Phoenix metropolitan area, and 4 miles to the north of Interstate 10 on Litchfield Road. It occupies approximately 4,842 acres and hosts the largest fighter wing in the USAF with 138 F-16s assigned to it. The host command at Luke AFB is the 56th FW, under Air Education and Training Command. An integral part of the Luke AFB F-16 and F-35 fighter pilot training mission is the BMGR, which consists of approximately 1.7 million acres of relatively undisturbed Sonoran Desert southwest of Luke AFB between Yuma and Tucson, Arizona, south of Interstate 8. Above is a 57,000-cubic-mile airspace where pilots practice air-to-air maneuvers and engage in simulated battlefield targets on the ground. Additionally, there are more than 85,000 cubic nautical miles of special use

airspace used for military operations beyond the airspace above Luke and BMGR, including adjacent Federal and Tohono O’odham lands and other parts of southwestern Arizona, as well as a region northeast of Flagstaff, AZ (BMGR East *Comprehensive Range Plan* [CRP] in prep.). The Luke AFB 56th Range Management Office (56 RMO) works closely with the Tohono O’odham Nation to maintain good relations with the tribal government, minimize impacts of overflights on the Tohono O’odham people, and educate range users about any concerns and the constraints imposed on operations in the Military Operation Area over Tohono O’odham lands (CRP, in prep.).

Roughly the size of Connecticut, the immense size of the BMGR complex allows for simultaneous training activities on nine air-to-ground and two air-to-air ranges. The 56 RMO manages the eastern BMGR activities and the Marine Corps Air Station at Yuma (MCAS Yuma) oversees operations on the western portion of BMGR. Luke AFB is transitioning to become the sole pilot training center for the F-35A, the USAF’s newest multi-role aircraft.

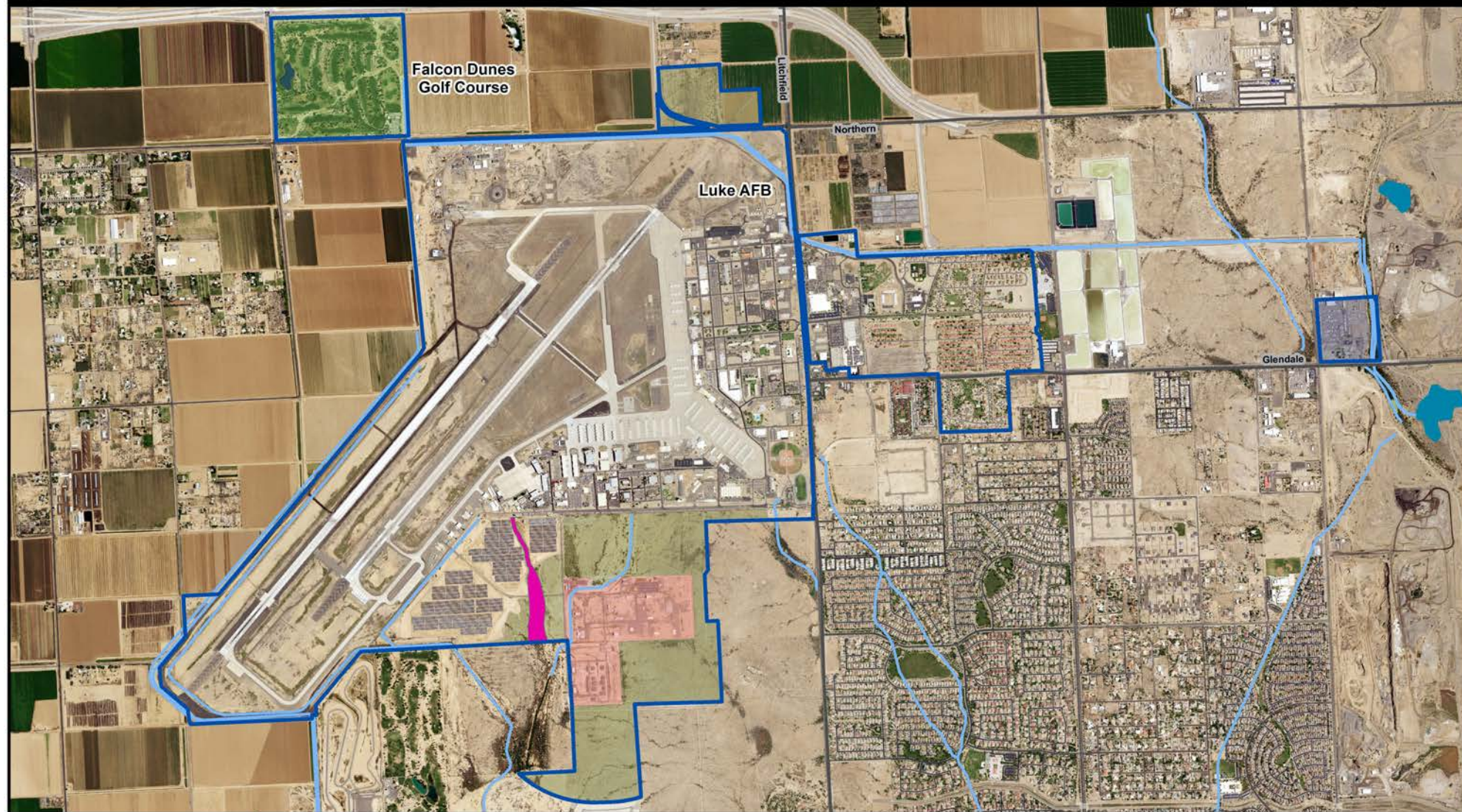
AUX-1 (Table 2.1, Figure 2.2) occupies approximately 1,105 acres. It is owned by the State of Arizona and leased to Luke AFB. AUX-1 is located approximately 4 miles east of U.S. Highway 60 on Happy Valley Road and about 13 miles northwest of Luke AFB, adjacent to the City of Surprise in central Maricopa County, Arizona. The White Tank Mountains lie approximately 5 miles south of the airfield.

Fort Tuthill (Table 2.1, Figure 2.3) is a 14.5-acre recreational facility. It is located two miles south of Flagstaff in Coconino County, Arizona, and just west of Pulliam Airport off Interstate 17 and State Route 89-A.

Figure 2.1: Luke AFB Installation Area

Luke AFB

2018-2023 Integrated Natural Resource Management Plan (INRMP)



## Legend

- City/Town
- ▭ Luke AFB
- Interstates
- Highways
- Main Road
- ▭ Lake/Pond
- Watercourse

## Luke AFB Land Cover

- ▭ Falcon Dunes Golf Course
- ▭ Luke AFB Developed Area
- ▭ Munition Storage
- ▭ Water
- ▭ Rangeland/Open Space
- ▭ Waste Water Treatment Plant
- ▭ Wildlife Management Area



World Geodetic System 1984 (WGS84) Projection  
Zone 12 N GCS\_WGS\_1984



Base data from ESRI StreetMap  
NAIP Imagery courtesy of FSA

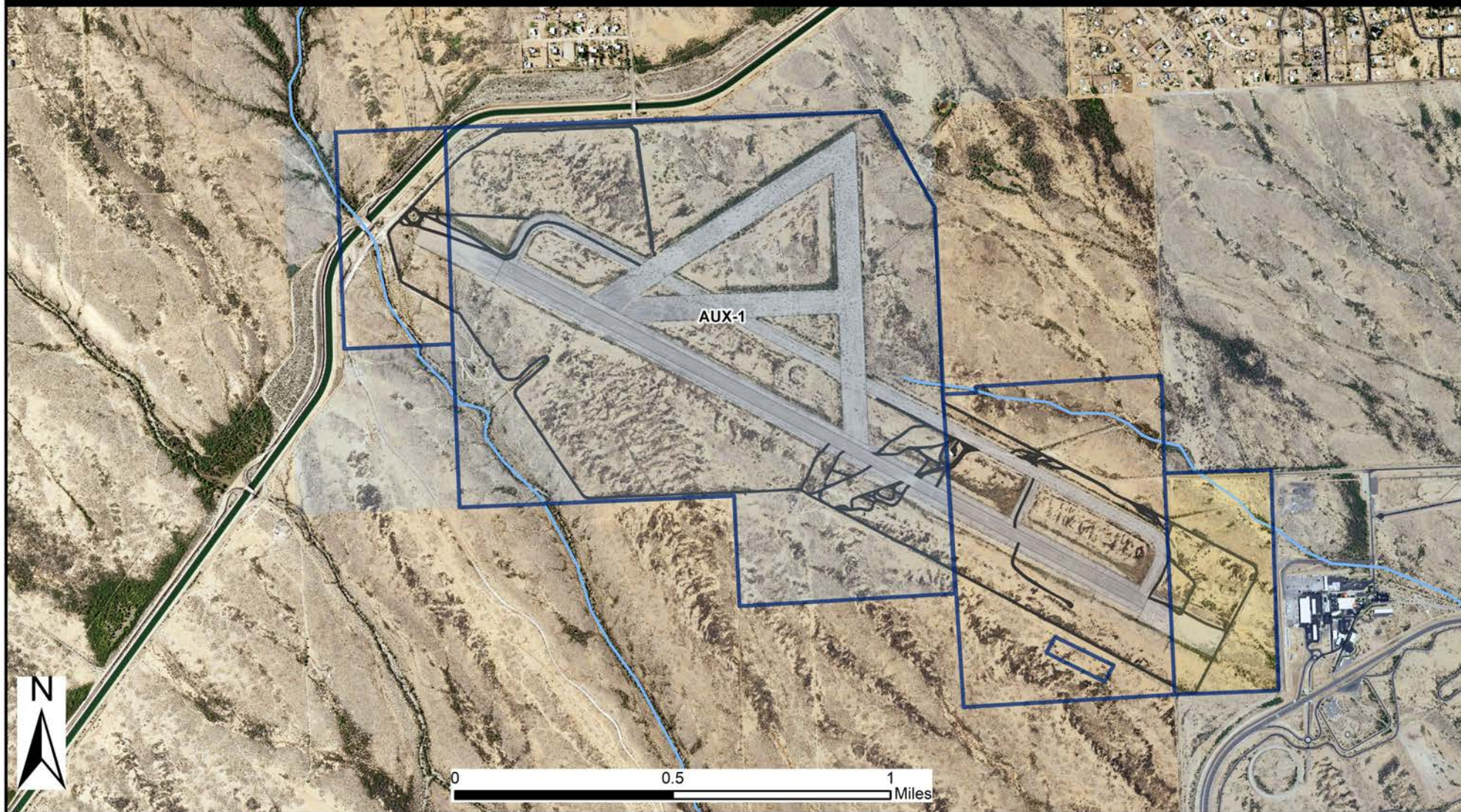
0 0.75 1.5 Miles



Figure 2.2: Luke AFB Auxillary Field #1 (AUX-1) Installation Area

Luke AFB

2018-2023 Integrated Natural Resource Management Plan (INRMP)

**Legend**

- City/Town
- Interstates
- Highways
- Main Road
- AUX-1 Road Area
- AUX-1 Airfield Surface
- Luke AFB Auxiliary Field # 1 (AUX-1)
- Bureau of Land Management (BLM)
- State of Arizona Trust Land

World Geodetic System 1984  
(WGS84) Projection  
Zone 12 N  
GCS\_WGS\_1984

Created By:  
Center for  
Environmental  
Management  
MILITARY LANDS  
Colorado State University

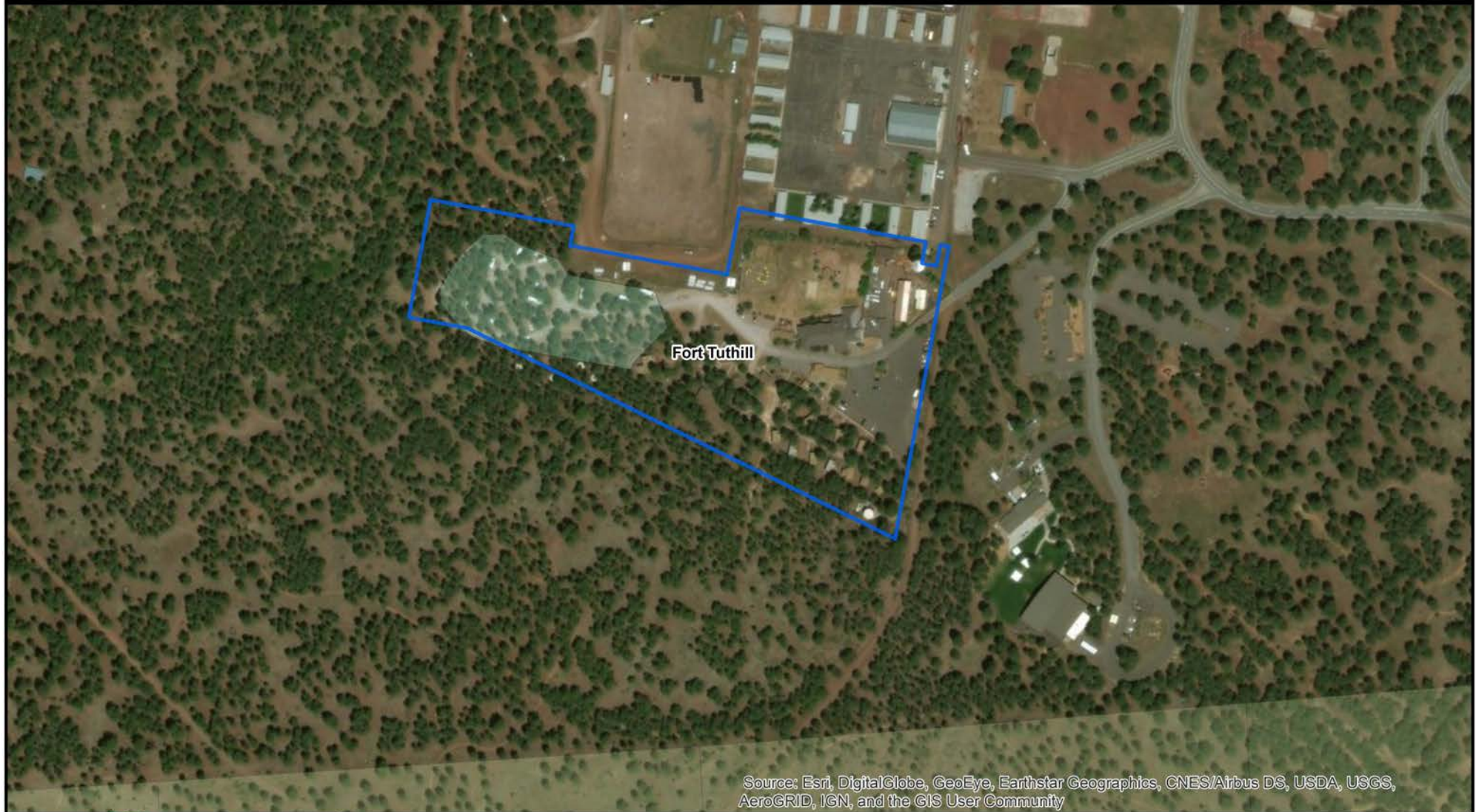
Base data from ESRI StreetMap  
NAIP Imagery courtesy of FSA



Figure 2.3: Fort Tuthill Recreation Area

Luke AFB

2018-2023 Integrated Natural Resource Management Plan (INRMP)

**Legend**

- City/Town
- Interstates
- Highways
- Main Road

- Fort Tuthill Recreation Area
- Fort Tuthill Camping Area
- Bureau of Land Management (BLM)

- State of Arizona Trust Land
- USDA Forest Service

N  
 World Geodetic System 1984  
 (WGS84) Projection  
 Zone 12 N  
 GCS\_WGS\_1984



Base data from  
 ESRI StreetMap

0 250 500 Feet



### 2.1.1 Installation History

#### Luke AFB

In 1940, a U.S. Army representative was sent to Arizona to select a site for an Army Air Corps training field for advanced training in conventional fighter aircraft. The city of Phoenix leased 1,440 acres of land to the government, at a rate of \$1.00 per year, effective 24 March 1941. On 29 March 1941, the Del. E. Webb Construction Co. began excavation for the first building at what was known at the time as the Litchfield Park AFB. It wasn't until 1941, when Luke Field in Pearl Harbor, Hawaii, was transferred to the Navy, that the commander of Litchfield AFB requested the name be changed to Luke Field. Luke Field was named after the first aviator to be awarded the Congressional Medal of Honor—2d Lt. Frank Luke Jr., born in Phoenix in 1897. During World War I, Luke, who was also known as the "Arizona Balloon Buster," scored 18 aerial victories (14 of which were German observation balloons) in the skies over France before being killed on 29 September 1918 at the age of 21.

The first class of 45 students, Class 41 F, arrived 6 June 1941, to begin advanced flight training in the AT-6, even though few essential buildings had been completed. Pilots flew out of the Sky Harbor Airport until the Luke runways were completed. Pilots received 10 weeks of instruction, with the first class graduating on 15 August 1941. Captain Barry Goldwater served as director of ground training the following year. During World War II, Luke was the largest fighter training base in the Army Air Force. The base graduated more than 17,000 fighter pilots from advanced and operational courses in the AT-6, P-40, P-51, and P-38, earning it the nickname "Home of the Fighter Pilot." By 7 February 1944, pilots at Luke had logged a million hours of flying time. By 1946, however, the number of pilots trained had dropped to 299 and the base was deactivated on 30 November 1946. After combat developed in Korea, Luke Field was reactivated on 1 February 1951 as Luke AFB, part of Air Training Command under a reorganized U.S. Air Force.

Students progressed from the P-51 Mustang to the F-84. Flying training at Luke changed to the F-100 and, on 1 July 1958, the base was transferred from Air Training Command to Tactical Air Command. In 1964, Luke continued its tradition of providing fighter training for allied nations when an F-104 program for German Air Force pilots and a program in the F-5 for pilots from developing nations began. During the 1960s, thousands of American fighter pilots completed their training and left to patrol the skies over Vietnam. In July 1971, the base received the F-4C Phantom II and became the main provider of fighter pilots for Tactical Air Command and fighter forces worldwide. In November 1974, the USAF's newest air fighter, the F-15 Eagle, came to Luke. In February 1983, fighter pilot training began for the F-16 Fighting Falcon. Luke units continued to set the pace for the USAF. The 58th Tactical Training Wing (TTW) had two squadrons—the 312th and 314th Tactical Fighter Training Squadrons—conducting training in the newest C and D models of the Fighting Falcon. The 405th TTW received the first E model of the F-15 Eagle in 1988 and two of its squadrons—the 461st and 550th—began training in this dual-role fighter. In July 1987, the Reserve function at Luke changed when the 302<sup>nd</sup> Special Operations Squadron deactivated its helicopter function and the 944th Tactical Fighter Group was activated to fly the F-16C/D.

The early 1990s brought significant changes to the base. As a result of defense realignments, the 312th, 426th, and 550th Tactical Fighter Training Squadrons were inactivated, as were the 832nd Air Division and the 405th TFW. The F-15A and B models were transferred out, and the 58th TFW, being the senior wing at Luke, was re-designated the 58th FW and once again became the host unit at Luke. In April 1994, after 24 years at Luke, the 58th FW was replaced by the 56 FW as part of the Air Force Heritage program. Air Force officials established the program to preserve Air Force legacy and history during a time of military draw-down. The 56 FW is one of the most highly decorated units in USAF history and was selected to remain part of the active fighter force while the 58th was reassigned as a special operations wing to Kirtland AFB, New Mexico.

### AUX-1

The first of Luke's auxiliary airfields, AUX-1, was activated on 1 July 1941. AUX-1 served as the training site for P-40 operations when Luke Field became too congested with aircraft. Today, about 12,000 operations are conducted per year at AUX-1 for instrument-approach training. Under this training, pilots use the instrument landing systems at AUX-1 to simulate approaches under poor weather conditions. One non-active runway at AUX-1 is used for instrument-approach runway alignment for Tactical Air Navigation-approaches, which are non-precision with course guidance but not with glide path guidance; Instrument Landing System approaches, which are precision approaches with both course and glide path guidance; and Precision Approach Radar, which also is a precision instrument approach system. AUX-1 is one of only a few locations in the U.S. for training with Precision Approach Radar, which is commonly used in overseas locations.

### Fort Tuthill

Fort Tuthill was a training site for the 158th Infantry Regiment of the Arizona National Guard from 1929 to 1937, in 1939, and in 1948. Established in 1928 as Camp Tuthill (after Brigadier General Alexander M. Tuthill, Commander of the National Guard), it was renamed Fort Tuthill in 1929. Located in pine covered forest, the site allowed for the regiment to meet training objectives that the Arizona desert climate would not allow. In 1955, the Fort became a county park and houses the Fort Tuthill Military Museum. Fort Tuthill currently provides recreational opportunities and lodging to active duty personnel, of any branch of service, and their immediate families. The facilities include a hotel, A-frames, cabins, and yurts.

#### 2.1.2 Military Missions

The primary mission at Luke AFB is training F-16 and F-35 pilots. The base mission statement is "We train the world's greatest fighter pilots and combat ready airmen." to "build the future of airpower."



Figure 2.4: F-35 Lightning II flies alongside an F-16 Fighting Falcon. Photo courtesy of Matthew Short.

### 2.1.3 Surrounding Communities

The largest communities near Luke AFB are identified in Table 2.2 along with 2010 U.S. Census data and 2011-2015 American Community Survey 5-Year Estimates.

Table 2.2: Surrounding community population 2010–2015.

City	2010 U.S. Census Data <sup>1</sup>	Recent Population Estimates <sup>2</sup>
Avondale, Maricopa County	76,238	82,881
Glendale, Maricopa County	226,721	245,895
Peoria, Maricopa and Yavapai, County	154,065	164,173
Sun City, Maricopa County	37,499	39,363 <sup>3</sup>
Surprise, Maricopa County	117,517	127,492 <sup>3</sup>
El Mirage, Maricopa County	31,797	35,043
Phoenix, Maricopa County	1,445,632	1,615,017
Flagstaff, Coconino County	65,870	71,459

<sup>1</sup> 2011–2015 American Community Survey (ACS) 5-year estimates, at <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>.

<sup>2</sup> 2016 U.S. Census Bureau population estimates, by city, at <https://www.census.gov/>.

<sup>3</sup> 2016 U.S. Census Bureau population estimates not available; 2012–2016 5-year ACS 5-year estimates, at [https://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml](https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml).

The majority of communities near Luke AFB are in Maricopa County, Arizona. Maricopa County has had the largest annual population increase among any counties in the U.S., with a population now estimated at 4.2 million people. Phoenix was the fastest growing metropolitan area in the U.S. from 2015 to 2016, averaging an increase of 222 people per day.

Arizona recognizes the importance of military aviation to its economy and the safety concerns that arise from incompatible land uses in the vicinity of military airports. To mitigate that risk, the State has adopted legislation to restrict land use in the vicinity of military airports. Pursuant to Arizona Revised Statutes (A.R.S.) § 28-8481 (F) and (P) and Attorney General Opinion No. I08-003, no new residential development shall occur within a High Noise or Accident Potential Zone. This designation helps to ensure that future development is compatible with adverse effects that military aircraft may have on public health and safety.

### 2.1.4 Local and Regional Natural Areas

#### Luke AFB

The areas surrounding Luke AFB can be described as densely populated suburbia with few patches of undeveloped land. Within about 5 miles of the installation, there are nearly 12 golf club communities with maintained grassy greens, scattered ponds, and a few disconnected patchworks of

trees and shrubs. The Wildlife World Zoo is located about 0.5 mile to the northwest of Luke AFB and has an abundance of planted and maintained trees, ground cover, and other vegetation to provide habitat for its collection of South American and African animals. There are no current records of federally listed species breeding or occurrences of federally listed plant species within a five-mile radius, although it is possible that listed migratory birds, federally protected bald/golden eagles, or Arizona Species of Greatest Conservation Need could occur within this radius.

The nearest park (about 8 miles away) of significant size that also has natural vegetation is the White Tank Mountain Regional Park, which is described in more detail in the following (AUX-1) section. The BMGR (see Volume 1) is located approximately 60 miles to the southwest of Luke AFB and is the largest expanse of relatively unfragmented Sonoran Desert in the U.S. With the exception of State Route 85, the land is free of major developments and is ecologically linked to Organ Pipe Cactus National Monument, Cabeza Prieta National Wildlife Refuge, Sonoran Desert National Monument, and lands administered by the Bureau of Land Management.

### **AUX-1**

AUX-1 is located near White Tank Mountain Regional Park, which covers nearly 30,000 acres, making it the largest park in Maricopa County. The park encompasses the rugged White Tank Mountains, which is a freestanding range that separates the Phoenix Basin of the Salt River from the Hassayampa Plain. The park has a rich history, with eleven archaeological sites dating back to A.D. 500–1100, petroglyphs, and possible agricultural terraces or check dams. The park offers approximately 25 miles of trails with vegetation characteristic of the Sonoran Desert.

### **Fort Tuthill**

Fort Tuthill is enveloped within the boundary of a larger county park that is surrounded by Coconino National Forest. The vegetation is primarily disturbed, open ponderosa pine forest or woodland and is typical for the forest in this region.

## **2.2 Physical Environment**

### **2.2.1 Climate**

The Southwest region of the U.S. has become warmer and drier over the past century, and projections expect this trend to continue into the 21st Century (Overpeck et al. 2013). Droughts are expected to become more severe, and precipitation extremes in the winter are expected to become more frequent and intense (Overpeck et al. 2013). Significant changes in the regional climate will have broad impacts on ecosystems and will have consequences for biodiversity (Bagne and Finch 2012).

### **Luke AFB**

The climate at Luke AFB is characterized by warm-to-hot spring, summer, and early fall temperatures. The average July high temperature at nearby Litchfield Park is 106.9 degrees Fahrenheit. Mean temperatures in spring and fall are 86.1 (April) and 89.5 degrees Fahrenheit (October), respectively. Winter temperatures tend to be mild; January is the coolest month of the year, with an average daily high temperature of 66.8 degrees Fahrenheit. Daily minimum

temperatures range from 75.9 (July) to 36.5 degrees Fahrenheit (January). On an annual average, Litchfield Park has 177 days when high temperatures reach or exceed 90 degrees Fahrenheit and 29 days per year when low temperatures drop to or fall below 32 degrees Fahrenheit.

Precipitation at Litchfield Park occurs almost entirely in the form of rain. The occurrence of snow, sleet, and hail are rare events that generate just trace amounts of precipitation. Winter rains occur primarily in December and January, with an annual average of 1.06 and 0.93 inches, respectively. August is normally the wettest month of the year at Litchfield Park, with an annual average of 1.21 inches of rain. Winter rains result from weather fronts that begin in the Pacific Ocean and move east across Arizona. They are generally quite widespread and characterized by gentle rainfall. Summer rains result from moisture moving into Arizona from Mexico, the Gulf of Mexico, and/or the Gulf of California. Summer rains or monsoons tend to be highly localized and result in brief, torrential downpours often accompanied by high winds and lightning. Drought conditions in the vicinity of Luke AFB are common. The weather station at Litchfield Park normally receives about 8 inches of precipitation annually, but extended periods of drought have been recorded.

### **AUX-1**

The climate of AUX-1, like Luke AFB, is characterized by warm-to-hot spring, summer, and early fall temperatures. For example, the average July high temperature at the community of Wittman, located four miles north of AUX-1, is 105.4 degrees Fahrenheit. Mean high temperatures in spring and fall are 81.8 (April) and 87.0 degrees Fahrenheit (October), respectively. Record high temperatures for Wittman approach 120°F. Winter temperatures are moderate; January is the coolest month of the year with daily highs in the low 60s, averaging 63.6 degrees Fahrenheit and lows in the middle 30s, averaging 35.8 degrees Fahrenheit. On average, winter low temperatures can be expected to drop to 32 degrees Fahrenheit or lower on 26 days from November through March (Sellers and Hill 1974).

Precipitation at AUX-1 occurs almost entirely in the form of rain. As is the case in most of west-central Arizona, snow, sleet, and hail events are extremely rare and hardly ever exceed a trace amount. Wittman normally receives about nine inches of rainfall per year, with late spring generally being the driest season of the year. In most years, no rainfall occurs during the month of June, which has a long-term average of 0.06 inches/month. July and August are among the wettest months of the year, averaging 1.04 and 1.33 inches, respectively. Only December (1.06 inches) and January (0.93 inches) are comparable (Sellers and Hill 1974).

### **Fort Tuthill**

The climate of Fort Tuthill is vastly different from that of Luke AFB and AUX-1. Mean annual monthly temperatures range from about 30.5 to 61.2 degrees Fahrenheit. The mean monthly average temperature in July is 65.9 degrees Fahrenheit. January is the coolest month of the year, with an average monthly high temperature of 42.6 degrees Fahrenheit. Daily minimums range from 32.0 in July to -22.0 degrees Fahrenheit in January. On an annual average, Fort Tuthill has 3.1 days where high temperatures reach or exceed 90 degrees Fahrenheit and 208.9 days per year where low temperatures drop to or fall below 32 degrees Fahrenheit. The average frost-free season ranges from 90–120 days. In general, the nighttime freezing temperatures usually begin by mid-September and end in June.

At Fort Tuthill, mean monthly precipitation ranges from 0.0 to 10.05 inches over 50 years of record keeping. Annual mean winter snowfall ranges from 52.9 to 132.6 inches with extremes up to 184.3 inches. Spring is generally the driest season of the year.

## **2.2.2 Landforms**

### **Luke AFB**

The topography of Luke AFB is flat, with elevations ranging from 1,075 to 1,105 feet above mean sea level (AMSL). The base area generally slopes from north to south. Erosion on Luke AFB is controlled only by a man-made canal system found on the northern, southern, and western perimeters of the airfield. There are two hills between Litchfield Road and the munitions storage area near the southeastern boundary of the main portion of Luke AFB. The southernmost hill is known as Sunset Point, the elevation of which is approximately 1,125 feet AMSL. The other hill (unnamed) is about 1,500 feet to the north and has an elevation of approximately 1,100 feet AMSL.

### **AUX-1**

The topography of AUX-1 is flat. The elevation of the northwest portion of the site, adjacent to Trilby Wash, is approximately 1,560 feet AMSL. The site slopes from northwest to southeast. The approximate elevation of the southeast portion of the site is 1,500 feet AMSL.

### **Fort Tuthill**

Fort Tuthill lies in an area where the slope varies from 0 to 10 percent or greater, with elevations ranging from 6,990 to 7,060 feet. The hotel and immediate structures are in an area characterized by slopes of 2–5 percent surrounded by areas of 5–10 percent slope; the balance of the property is characterized by slopes of greater than 10 percent.

## **2.2.3 Geology and Soils**

### **Luke AFB**

Luke AFB is in the Basin and Range physiographic province of the inland Western U.S. and Northwestern Mexico. This province is characterized by north-south trending mountain ranges separated by broad, alluvial valleys (Fenneman 1931). It is situated in the Luke basin, one of many deep, broad basins bound by narrow fault-block mountain ranges. The base is located approximately six miles to the east of the White Tank Mountains (Cook 2013). The White Tank Mountains trend north-south and are remnants of faulted blocks of the earth's crust. To the south are the Sierra Estrella Mountains and to the north are the Hieroglyphic Mountains and numerous inselbergs (Cook 2013). Erosion from these mountains has deposited large volumes of sand and gravel on the valley floors, in many places so deep that it is often difficult to estimate the thickness of these deposits (Chronic 1983). The depth of bedrock in the Luke Basin area ranges from 400 feet near the base of the White Tank Mountains to over 11,200 feet on the eastern edge of the basin (Cook 2013).

Rock types commonly found at Luke AFB include gravel-sized fragments of metamorphic gneiss and igneous granite, both typical of the White Tank Mountains. These rocks are found randomly dispersed in the soil matrix consisting of loam or mixtures of sands, silts, and clays. No sinks or fossil

beds are known to occur at Luke AFB and there are no geological features present to suggest the presence of any fossil beds. The Luke basin contains extensive amounts of evaporate deposits that are a likely remnants of a closed-basin saline lake. The largest of these evaporate deposits is the Luke Salt Body, which is a large salt dome deposit approximately 9 miles long, 6 miles wide, and possibly up to 10,000 feet thick (Cook 2013). Upper-level unconsolidated sediments have been the source of groundwater in the area since the early 1900s.

### **AUX-1**

AUX-1 is also located within the Basin and Range Physiographic Province of the southwestern U.S. (Fenneman 1931). It is situated in a basin approximately five miles east of the White Tank Mountains. The White Tank Mountains trend north-south and are remnants of faulted blocks of the earth's crust. The Vulture Mountains are located to the north and the Hieroglyphic Mountains to the northeast. Erosion from these mountains has resulted in the deposition of large volumes of sand and gravel onto the valley floors (Chronic 1983).

Gravel- to boulder-sized fragments of metamorphic and igneous rock, including schist, gneiss, and granite, all typical rock types of the adjacent mountain ranges, can be found in the AUX-1 alluvium. Volcanic rock identified as pink, moderately-to-highly-welded tuff can also be found in the alluvium at the site and likely originates from the Vulture Mountains, where volcanic tuff and schist are the dominant rock material (Chronic 1983). Rock material is randomly dispersed in the sand, silt, and clay soil matrix at AUX-1. Various authorities indicate that the area around AUX-1 may not be a significant mineral resource area (McCory and O'Hare 1965, Stipp et al. 1967, Beikman et al. 1986). No fossil beds are known to occur in the area.

### **Fort Tuthill**

According to the Natural Resource Conservation Service soil map for Coconino County, Fort Tuthill lies within the Broliar-Sponseller Association that is comprised of high basaltic plateaus and mesas south of Flagstaff. The soils are moderately deep and moderately fine-textured. Overall, slopes range from 0 to 30 percent throughout the entire park system.

Broliar soils have dark-colored, cobbly or stony loam surface layers covered by forest litter with reddish brown clay loam or clay subsoils. Broliar soils compose approximately 60 percent of the association, with Sponseller soils making up the other 30 percent. The permeability of Broliar soils is slow, ranging from 0.06 to 0.20 inches per hour with a high water-holding capacity of 0.13 to 0.16 inches at a depth of 30 to 60 inches. Ordinarily found on basalt bedrock, Broliar soils have a high shrink-swell potential and moderate frost action. Erosion potential for this soil association is severe on slopes greater than 8 percent.

Sponseller soils occur on basalt flows and cinder cones with dominant slopes of 8–25 percent. They have reddish-brown, gravelly or cobbly loam surface layers with reddish-brown gravelly or cobbly clay loam subsoils. Basalt bedrock lies at a depth of 30 to 60 inches. Weathered bedrock of basaltic or cindery materials occur at a depth of 24 to 60 inches. A majority of this soil association lies within the U.S. National Forest. Sponseller soils drain slowly, with a permeability rate ranging from 0.2 to 0.6 inches per hour. As with the Broliar soils, Sponseller soils have a high water-holding capacity of

0.13 to 0.16 inches in cinders or fractured basalt at a depth of 24 to 60 inches. The shrink-swell potential is moderate to high, as is the potential for frost action. Erosion potential is moderate to severe on slopes greater than 40 percent.

## **2.2.4 Hydrology**

### **Luke AFB**

Principal rivers in the region include the Salt and Gila Rivers. The Salt River flows into the Gila River south of the greater Phoenix area. Near Luke AFB, the Agua Fria River is intermittent and runs infrequently during storm events. There are no perennial or intermittent streams present on base. The area immediately surrounding Luke AFB is highly developed and most natural drainage features have been altered. Surface water at Luke AFB is very limited to nonexistent. During storm events, sheet-flow surface water runoff occurs towards the south of the base. There is a man-made canal around the perimeter of the airfield.

### **AUX-1**

Surface-water runoff at AUX-1 occurs towards the southeast by way of a man-made drainage canal that parallels the abandoned runway, and by five, small, unnamed drainages paralleling the Trilby Wash south of the runway. The Trilby Wash drainage trends northwest to southeast and crosses the western boundary of the AUX-1 site. Surface runoff from AUX-1 flows into the Trilby Wash Detention Basin and into the Agua Fria River. Downstream, the Agua Fria River drains into the Gila River. The Granite Reef Aqueduct of the Central Arizona Project passes along the northwestern boundary of AUX-1, but it does not appear to affect on-site erosional features.

### **Fort Tuthill**

Surface water runoff is generally down slope from south to north and from west to east at Fort Tuthill. In terms of soil limitations for septic tank leach fields, both the Broliar and the Sponseller soil associations have severe limitations due to its slow permeability rate of less than 0.60 inches per hour. In addition, Broliar soils tend to have a layer of bedrock 3–4 feet below the surface, further impacting infiltration.

## **2.3 Ecosystems and the Biotic Environment**

Ecoregions denote areas of general similarity in ecosystems and in the type, quality, and quantity of environmental resources. They are designed to serve as a spatial framework for the research, assessment, management, and monitoring of ecosystems and ecosystem components. Ecoregions are critical for structuring and implementing ecosystem management strategies across various agencies and organizations. Ecoregions are identified through the spatial patterns and composition of biotic and abiotic phenomena, including geology, physiography, vegetation, climate, soils, land use, wildlife, and hydrology. A Roman numeral hierarchical scheme has been adopted for different levels of ecological regions, with Level I being the coarsest and Level IV the most detailed. Luke AFB and AUX-1 lie within the Level III Sonoran Basin and Range Ecoregion, and within the Gila/Salt Intermediate Basins Level IV ecoregions (Griffith et al. 2014). The Gila/Salt Intermediate Basin ecoregion supports

the majority of the state's human population and has permanently altered ecological features and processes (Griffith et al. 2014).

Fort Tuthill lies within the Level III Arizona/New Mexico Mountains and within level IV Montane Conifer Forest ecoregions. The ecoregion is based upon the oldest mountains in the Southwest, containing Precambrian igneous rocks as old as 1.5 billion years. These older volcanic deposits are overlaid by recent sediments and recent Holocene volcanics. This results in a diverse physiographic region with elevations ranging from 6,000 to 9,700 feet in Arizona. The region contains more species of birds and mammals than any other place in the southwestern region of the U.S. (Bell et al. 1999). Ponderosa pine forests in the mountains are subject to fire and flood from poorly managed livestock grazing, fire suppression, and altered hydrological regimes on nearly all levels.

### 2.3.1 Vegetation

#### Luke AFB

Luke AFB is situated in the Lower Colorado River Valley Subdivision of the Sonoran Desert (Brown and Lowe 1980). The Lower Colorado River Valley Subdivision is the largest and most arid subdivision of the Sonoran Desert (Turner and Brown 1982). This subdivision is dominated by broad, intermontane plains of alluvial soils, although it is not restricted to this physical setting. Vegetation is generally open and simple, often with many hundreds of square miles dominated by one or two species of low-growing shrubs. The ground surface between shrubs may be fine-textured soil or desert pavements consisting of gravel or rock. Plants are drought-resistant with sclerophyllous adaptations to retard transpiration. Creosote bush (*Larrea tridentata*) is the dominant plant species at most localities, typically forming monotonous, uniform growth on the flat intermontane plains, occasionally broken by paloverde (*Parkinsonia* spp.) and mesquite (*Prosopis* spp.) along the washes.

#### AUX-1

As with Luke AFB, AUX-1 is situated in the Lower Colorado River Valley Subdivision of the Sonoran Desert (Turner and Brown 1982). Vegetation is composed almost entirely of drought-adapted (e.g., the microphyllous species) or drought-avoiding species (e.g., the macrophyllous species that are active only during periods of abundant moisture). The site has a history of disturbance and human use, which is manifested in the present distribution of vegetation across the site. In the absence of disturbance, AUX-1 would likely be dominated by a creosote bush-bursage (*Ambrosia* spp.) shrubland community, with mesquite and blue paloverde (*P. florida*) shrublands and woodlands occurring along the major drainages. At present, there are a few highly degraded creosote-bursage communities. A majority of AUX-1 is dominated by weedy perennial and annual species. Degraded mesquite and blue paloverde shrublands and woodlands are found along the drainages and a mesquite scrub shrub community grows in the low-lying areas.

#### Fort Tuthill

At an average elevation of 7,000 feet, Fort Tuthill is located in the cold-temperate climatic zone, which encompasses the Montane Conifer Forest biotic community (Brown and Lowe 1980). Generally, montane forests in the region can be divided into two major communities: a Ponderosa Pine forest and woodland, which is generally found at lower elevations and along south facing slopes;

and a Douglas Fir (*Pseudotsuga menziesii*), White Fir (*Abies concolor*), Limber Pine (*P. flexilis*), and Aspen (*Populus tremuloides*) forest community, which occurs on north facing slopes, in deep canyons, and at higher elevations.

The Fort Tuthill area is dominated by degraded ponderosa pine forests that occur in a “dog-hair thicket” stage characterized by numerous small and closely spaced trees. Gambel oaks (*Quercus gambelii*) are also present in small numbers, as well as a scattering of other tree species. An inventory of vertebrate and plant species likely to occur and actually observed at Fort Tuthill will be included when results from planned species and habitat surveys (see Table 10.1) are available.

### 2.3.2 Turf and Landscaped Areas

#### Luke AFB

The largest turf and landscape area at Luke AFB is the Falcon Dunes Golf Course, an 18-hole course occupying approximately 100 acres directly north of the main base. It was constructed as part of a Maricopa County Flood Control District project to contain flooding from Luke AFB and other nearby communities. The golf course is designed to contain runoff from a 100-year storm event. About 30 acres of the course are xeriscaped with regionally appropriate, drought-tolerant (low water use), native vegetation; only the greens, tees, fairways, and parts of the rough are turf.

#### AUX-1

There are not any landscaped areas at AUX-1.

#### Fort Tuthill

The only landscaped areas are around the main hotel and outbuildings. Ornamental landscaping is rudimentary around the cabins and vegetation is cleared away from the primitive campsites.

### 2.3.3 Fish and Wildlife

The last wildlife surveys at Luke AFB, AUX-1, and Fort Tuthill were conducted during the 1980s and 1990s. Luke AFB has programmed funding for the AGFD to conduct wildlife and habitat surveys to update the wildlife inventory. Surveying will begin in FY 2018 and continue for three years.

#### Luke AFB

Luke AFB is a highly developed area with some wildlife habitat utilized by an array of generalist species and no water resources for fish. Wildlife species present at Luke AFB are characteristic of the Lower Colorado River Valley Subdivision of the Sonoran Desert (Turner and Brown 1982) and urban-adapted species common to this area of Central Arizona. Small, nocturnal, burrowing species of Heteromyid rodents (e.g., pocket mice [*Chaetodipus* spp.] and kangaroo rats [*Dipodomys* spp.]); bats; and diurnal, burrowing species (e.g., round-tailed ground squirrel [*Xerospermophilus tereticaudus*]) are probably the most common and most likely to be encountered in areas that retain some natural habitat characteristics. Bats are unlikely to occur in large numbers over the highly urbanized and landscaped areas of the base. It is common, however, to find small numbers of foraging and/or roosting bats in the area. Other mammals likely to occur within the relatively intact native habitats include black-tailed jackrabbit (*Lepus californicus*), desert cottontail (*Sylvilagus audubonii*), kit fox

(*Vulpes macrotis*), and coyote (*Canis latrans*). Some species, particularly the desert cottontail and coyote, are highly adapted to urbanized settings and may utilize landscaped areas such as the golf course. The presence of these prey species may attract a variety of raptors, including (but not limited to) ferruginous hawks (*Buteo regalis*), red-tailed hawks (*Buteo jamaicensis*), American kestrels (*Falco sparverius*), and western burrowing owls (*Athene cunicularia*), as well as vultures. These birds have been observed infrequently, but may occasionally hunt on these grounds or even become resident species.

Surveys conducted in the 1990s by the U.S. Army Corps of Engineers (USACE 1994) indicated that the most common birds at Luke AFB include the mourning dove (*Zenaida macroura*), horned lark (*Eremophila alpestris*), common starling (*Sturnus vulgaris*), great-tailed grackle (*Quiscalus mexicanus*), and house finch (*Haemorhous mexicanus*). Among this group of birds, the starling, grackle, and finch are mostly associated with human habitation and landscaped habitats. Mourning doves also occur in such habitats but are also very common in native habitats. Horned larks are most common in the open, mowed fields surrounding the base airfield. Reptiles and amphibians likely to occur at Luke AFB include common, widely distributed species, such as side-blotched lizard (*Uta stansburiana*), western whiptail lizard (*Cnemidophorus tigris*), gopher snake (*Pituophis catenifer*), Great Plains toad (*Anaxyrus cognatus*), and Couch's spadefoot toad (*Scaphiopus couchii*). Reptiles and amphibians are most likely to occur in natural areas, although they may occasionally occur in developed areas.

#### AUX- 1

The wildlife of AUX-1 is also characteristic of the Lower Colorado River Valley Subdivision of the Sonoran Desert (Turner and Brown 1982). Small mammal, bird, reptile, and amphibian species are the most commonly observed wildlife at AUX-1 (Dames & Moore 1994). Surveys from the 1990s describe the presence of desert cottontail, black-tailed jackrabbit, kangaroo rats and pocket mice (Dames & Moore 1994). Additionally, more than one hundred bird species have been observed at AUX-1 over the course of a year, including the spring and fall migration seasons (Dames & Moore 1994). Common bird species at AUX-1 include red-tailed hawk, mourning dove, greater roadrunner (*Geococcyx californianus*), common raven (*Corvus corax*), northern mockingbird (*Mimus polyglottos*), cactus wren (*Campylorhynchus brunneicapillus*), curve-billed thrasher (*Toxostoma curvirostre*), verdin (*Auriparus flaviceps*), and loggerhead shrike (*Lanius ludovicianus*). Reptiles consist of a diverse array of lizards and snakes; however, amphibians are limited in numbers due to the absence of aquatic habitats (Dames & Moore 1994). Common reptiles at AUX-1 include the desert spiny lizard (*Sceloporus magister*), western whiptail lizard, side-blotched lizard, tree lizard (*Urosaurus ornatus*), gopher snake, night snake (*Hypsiglena torquata*), and western diamondback rattlesnake (*Crotalus atrox*). Larger predators also likely inhabit the area. Potential dens observed at AUX-1 could have been constructed by either badgers (*Taxidea taxus*), kit foxes, or grey foxes (*Urocyon cinereoargenteus*), although the habitat is most typical of that occupied by kit foxes. Given the apparently healthy population of round-tailed ground squirrels and other rodents at the site, there may be a sufficient prey base present to support these predators. At least one coyote has been observed in the area.

Evidence of trespass cattle (*Bos taurus*) has been observed at AUX-1. Cattle grazing is not permitted at AUX-1, nevertheless cattle periodically find their way onto the site, representing a recurring problem. Human trespass is frequent, including pedestrians, horseback riders, and vehicles.

### **Fort Tuthill**

The wildlife of Fort Tuthill is a combination typical to the ponderosa pine forest ecosystems of southwestern U.S. and for disturbed areas in the region. Large predators, such as black bears (*Ursus americanus*) and mountain lions (*Puma concolor*), as well as elk (*Cervus canadensis*) and deer (*Odocoileus* spp.), may be found at Fort Tuthill. Other species that have been observed at the site include house sparrows (*Passer domesticus*), house finches, and barn swallows (*Hirundo rustica*).

Feral animals, specifically common house cats (*Felis catus*), are common in the disturbed portions of Fort Tuthill and associated buildings. Feral and free-ranging cats have the potential to be serious pests at Fort Tuthill as they tend to impact native wildlife and migratory bird species. The DoD mandates that all domestic cats be kept indoors in order to keep them safe, and to prevent the killing of federally protected wildlife species on federal lands. Such incidents would violate the DoD's Memorandum of Understanding (MOU) with the USFWS to protect birds covered by the Migratory Bird Treaty Act or 1918 (MBTA).

### **2.3.4 Threatened and Endangered Species and Species of Concern**

The most recent surveys for protected species conducted at Luke AFB, AUX-1, and Fort Tuthill took place in the 1980s and 1990s; no federal or state listed species were detected at that time. Beginning in 2018, Luke AFB has programmed funding to have the AGFD conduct a three-year survey for updating its knowledge of federal and state protected species and potential habitats on the installation. This section will be updated with new survey information once the survey analysis has concluded.

### **Special Status Species Definition**

Special status species are species of plants and animals that, because of their scarcity or documented declining population in a state or nation, have been placed on a special status list. Those lists include any endangered, threatened, proposed, candidate, Species of Greatest Conservation Need (SGCN), or otherwise sensitive species. Both the USFWS and AGFD maintain such lists (Table 2.3).

The USFWS has the authority to list species of plants and animals as endangered or threatened for protection under the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 et seq.) (hereafter referred to as the ESA). The ESA is intended to provide a program of protection for listed species and the ecosystems upon which these species depend. Endangered species are those in danger of extinction throughout all or a significant portion of their ranges and threatened species are those likely to become endangered within the foreseeable future if corrective measures are not taken. Species proposed for listing as endangered or threatened are also protected by the ESA. All federal agencies are required to consult with the USFWS if actions they propose may affect a listed species.

Table 2.3: Federally threatened and endangered species and Arizona Species of Greatest Conservation Need at Luke AFB.

Common Name ( <i>Scientific Name</i> )	Federal Status <sup>1</sup>	Arizona Status <sup>2</sup> / SWAP Score <sup>3</sup>	Species of Greatest Conservation Need	Federal Register Reference
<b>Mammals</b>				
American beaver ( <i>Castor canadensis</i> )	NL	1b	✓	
Antelope jackrabbit ( <i>Lepus alleni</i> )	NL	1b	✓	
Arizona myotis ( <i>Myotis occultus</i> )	NL	SC/1b	✓	
Arizona pocket mouse ( <i>Perognathus amplus</i> )	NL	1b	✓	
Brazilian free-tailed bat ( <i>Tadarida brasiliensis</i> )	NL	1b	✓	
California leaf-nosed bat ( <i>Macrotus californicus</i> )	NL	SC/1b	✓	
Cave myotis ( <i>Myotis velifer</i> )	NL	SC/1b	✓	
Greater western bonneted bat ( <i>Eumops perotis californicus</i> )	NL	SC/1b	✓	
Harris' antelope squirrel ( <i>Ammospermophilus harrisi</i> )	NL	1b	✓	
Jaguar ( <i>Panthera onca</i> )	NL	1a	✓	
Kit fox ( <i>Vulpes macrotis</i> )	NL	1b	✓	
Lesser long-nosed bat ( <i>Leptonycteris curasoae yerbabuena</i> )	LE	SC/1a	✓	53 FR 38456, 30 September 1988
Little pocket mouse ( <i>Perognathus longimembris</i> )	NL	1b	✓	
Mexican gray wolf ( <i>Canis lupus baileyi</i> )		LE,XN		
Ocelot ( <i>Leopardus pardalis</i> )	LE	1a	✓	
Pale Townsend's big-eared bat ( <i>Corynorhinus townsendii pallescens</i> )	S	SC/1b	✓	
Pocketed free-tailed bat ( <i>Nyctinomops femorosaccus</i> )	NL	1b	✓	
Sonoran pronghorn ( <i>Antilocapra americana sonoriensis</i> )	LE	SC/1a	✓	32 FR 4001, 11 March 1967
Spotted bat ( <i>Euderma maculatum</i> )	NL	SC/1b	✓	
Western red bat ( <i>Lasiurus blossevillii</i> )	S	1b	✓	

Common Name ( <i>Scientific Name</i> )	Federal Status <sup>1</sup>	Arizona Status <sup>2</sup> / SWAP Score <sup>3</sup>	Species of Greatest Conservation Need	Federal Register Reference
Western yellow bat ( <i>Lasiurus xanthinus</i> )	NL	SC/1b	✓	
Yuma myotis ( <i>Myotis yumanensis</i> )	NL	SC/1b	✓	
<b>Birds</b>				
Abert's towhee ( <i>Melospiza aberti</i> )	S	1b	✓	
Arizona Bell's vireo ( <i>Vireo bellii arizonae</i> )	NL	1b	✓	
Bald eagle ( <i>Haliaeetus leucocephalus</i> )	BGEPA	SC/1a		16 U.S.C. 668–668d
California least tern ( <i>Sterna antillarum browni</i> )	LE			35 FR 8491, 2 June 1970
Ferruginous hawk ( <i>Buteo regalis</i> )	NL	SC/1b	✓	
Gila woodpecker ( <i>Melanerpes uropygialis</i> )	NL	1b	✓	
Gilded flicker ( <i>Colaptes chrysoides</i> )	NL	1b	✓	
Golden eagle ( <i>Aquila chrysaetos</i> )	BGEPA	1b	✓	
Le Conte's thrasher ( <i>Toxostoma lecontei</i> )	MBTA	SC/1c		16 U.S.C. 703–712
Lincoln's sparrow ( <i>Melospiza lincolni</i> )	NL	1b	✓	
Pacific wren ( <i>Troglodytes pacificus</i> )	NL	1b	✓	
Savannah sparrow ( <i>Passerculus sandwichensis</i> )	NL	1b	✓	
Sprague's pipit ( <i>Anthus spragueii</i> )	NL	SC/1a	✓	
Western burrowing owl ( <i>Athene cunicularia hypugaea</i> )	MBTA	SC/1c		16 U.S.C. 703–712
Wood duck ( <i>Aix sponsa</i> )	NL	1b	✓	
Yellow warbler ( <i>Setophaga petechia</i> )	NL	1b	✓	
Yellow-billed cuckoo ( <i>Coccyzus americanus</i> )	LT	SC/1a	✓	79 FR 59991, 3 October 2014
Yuma clapper rail ( <i>Rallus longirostris yumanensis</i> )	LE	SC/1a	✓	32 FR 4001, 11 March 1967
<b>Reptiles</b>				
Desert mud turtle ( <i>Kinosternon sonoriense sonoriense</i> )	NL	1b	✓	
Gila monster ( <i>Heloderma suspectum</i> )	NL	1a	✓	
Regal horned lizard ( <i>Phrynosoma solare</i> )	NL	1b	✓	

Common Name ( <i>Scientific Name</i> )	Federal Status <sup>1</sup>	Arizona Status <sup>2</sup> / SWAP Score <sup>3</sup>	Species of Greatest Conservation Need	Federal Register Reference
Saddled leaf-nosed snake ( <i>Phyllorhynchus browni</i> )	NL	1B	✓	
Sonoran collared lizard ( <i>Crotaphytus nebrius</i> )	NL	1B	✓	
Sonoran coralsnake ( <i>Micruroides euryxanthus</i> )	NL	1B	✓	
Sonoran Desert toad ( <i>Incilius alvarius</i> )	NL	1B	✓	
Sonoran Desert tortoise ( <i>Gopherus agassizii</i> )	NL	SC/1B	✓	
Sonoran whipsnake ( <i>Coluber bilineatus</i> )	NL	1B	✓	
Tiger rattlesnake ( <i>Crotalus tigris</i> )	NL	1B	✓	
Tucson shovel-nosed snake ( <i>Chionactis occipitalis klauberi</i> )	NL	SC/1B	✓	
Variable sandsnake ( <i>Chilomeniscus stramineus</i> )	NL	1B	✓	
<b>Amphibians</b>				
Arizona toad ( <i>Anaxyrus microscaphus</i> )	NL	SC/1B	✓	
Lowland leopard frog ( <i>Lithobates yavapaiensis</i> )	S	SC/1A	✓	
<b>Plants</b>				
Acuna cactus ( <i>Echinomastus rectocentrus</i> var. <i>acunensis</i> )	LE	HS		78 FR 60607, 1 October 2013
Arizona agave ( <i>Agave arizonica</i> )	NL	HS		
Arizona bugbane ( <i>Cimicifuga arizonica</i> )	NL	HS		
Arizona clematis ( <i>Clematis hirsutissima</i> Pursh var. <i>arizonica</i> )	NL	HS		
Arizona cliffrose ( <i>Purshia</i> (= <i>Cowania</i> ) <i>subintegra</i> )	LE	HS		49 FR 22326, 29 May 1984
Arizona hedgehog cactus ( <i>Echinocereus triglochidiatus</i> var. <i>arizonicus</i> )	LE	HS		44 FR 61556, 25 October 1979
Brady pincushion cactus ( <i>Pediocactus bradyi</i> )	LE	HS		44 FR 61784, 26 October 1979
Canelo Hills ladies-tresses ( <i>Spiranthes delitescens</i> )	LE	HS		62 FR 665, 6 January 1997
Catalina beardtongue ( <i>Penstemon discolor</i> )	NL	HS		

## Chapter 2

## INSTALLATION PROFILE

Common Name ( <i>Scientific Name</i> )	Federal Status <sup>1</sup>	Arizona Status <sup>2</sup> / SWAP Score <sup>3</sup>	Species of Greatest Conservation Need	Federal Register Reference
Chiricahua dock ( <i>Rumex orthoneurus</i> )	NL	HS		
Cochise pincushion cactus ( <i>Coryphantha robbinsiorum</i> )	LT	HS		51 FR 952, 9 January 1986
Desert Christmas tree ( <i>Pholisma arenarium</i> )	NL	HS		
Fickeisen plains cactus ( <i>Pediocactus peeblesianus fickeiseniae</i> )	LE	HS		78 FR 60607, 1 October 2013
Gentry milk vetch ( <i>Dalea tentaculoides</i> )	NL	HS		
Gierisch mallow ( <i>Sphaeralcea gierischii</i> )	LE			78 FR 49149, 13 August 2013
Golden-chested beehive cactus ( <i>Coryphantha recurvate</i> )	NL	HS		
Goodding's onion ( <i>Allium gooddingii</i> )	NL	HS		
Holmgren milk-vetch ( <i>Astragalus holmgreniorum</i> )	LE	HS		66 FR 49560, 28 September 2001
Huachuca groundsel ( <i>Senecio huachucanus</i> )	NL	HS		
Huachuca water-umbel ( <i>Lilaeopsis schaffneriana</i> var. <i>recurve</i> )	LE	HS		62 FR 665, 6 January 1997
Jones cycladenia ( <i>Cycladenia humilis</i> var. <i>jonesii</i> )	LT			51 FR 16526, 5 May 1986
Kaibab pincushion cactus ( <i>Pediocactus paradinei</i> )	NL	HS		
Kearney's blue-star ( <i>Amsonia kearneyana</i> )	LE	HS		54 FR 2131, 19 January 1989
Lemmon's fleabane ( <i>Erigeron lemmonii</i> )	NL	HS		
Murphey's century plant ( <i>Agave murpheyi</i> )	NL	HS		
Navajo sedge ( <i>Carex specuicola</i> )	LT	HS		50 FR 19370, 8 May 1985
Nichol's Turk's head cactus ( <i>Echinocactus horizonthalonius</i> var. <i>nicholii</i> )	LE	HS		44 FR 61927, 26 October 1979
Parish alkali grass ( <i>Puccinellia parishii</i> )	NL	HS		
Peebles Navajo cactus ( <i>Pediocactus peeblesianus</i> var. <i>peeblesianus</i> )	LE	HS		44 FR 61922, 16 June 1976

Common Name ( <i>Scientific Name</i> )	Federal Status <sup>1</sup>	Arizona Status <sup>2</sup> / SWAP Score <sup>3</sup>	Species of Greatest Conservation Need	Federal Register Reference
Pima pineapple cactus ( <i>Coryphantha scheeri</i> var. <i>robustispina</i> )	LE	HS		58 FR 49875, 23 September 1993
San Francisco Peaks groundsel ( <i>Senecio franciscanus</i> )	LT	HS		48 FR 52743, 22 November 1983
San Francisco Peaks ragwort ( <i>Packera franciscana</i> )	LT			48 FR 52743, 22 November 1983
Sandfood ( <i>Pholisma sonora</i> )	NL	HS		
Santa Rita mountain yellowshow ( <i>Amoreuxia gonzalezii</i> )	NL	HS		
Sentry milk-vetch ( <i>Astragalus cremnophylax</i> var. <i>cremnophylax</i> )	LE	HS		55 FR 50184, 5 December 1990
Siler pincushion cactus ( <i>Pediocactus</i> (= <i>Echinocactus</i> = <i>Utahia</i> ) <i>sileri</i> )	LT	HS		44 FR 61786, 26 October 1979
Smallflower century plant ( <i>Agave parviflora</i> )	NL	HS		
Texas purple spike ( <i>Hexalectris warnockii</i> )	NL	HS		
Tonto Basin century plant ( <i>Agave delamateri</i> )	NL	HS		
Trelease's century plant ( <i>Agave schottii</i> Engelm. var. <i>treleasei</i> )	NL	HS		
Welsh's milkweed ( <i>Asclepias welshii</i> )	LT			52 FR 41435, 28 October 1987
Yellow lady's slipper ( <i>Cypripedium calceolus</i> var. <i>pubescens</i> )	NL	HS		
Zuni fleabane ( <i>Erigeron rhizomatus</i> )	LT			50 FR 16680, 26 April 1985

<sup>1</sup> **Federal Status:** BGEPA=Bald and Golden Eagle Protection Act, **LE**=Endangered (U.S. Fish and Wildlife Service), **LT**=Threatened (U.S. Fish and Wildlife Service), **MBTA**=Migratory Bird Treaty Act, **NL**=Not listed, **S**=Sensitive species (Bureau of Land Management and/or U.S. Forest Service), **SC**=Species of Concern (U.S. Fish and Wildlife Service).

<sup>2</sup> **Arizona Status:** **LE**=Listed endangered, **HS**=Highly Safeguarded, **SC**=Species of Concern, **NA**=Not Applicable, **NR**=Not Rated, **XN**=Experimental non-essential population.

<sup>3</sup> **Arizona State Wildlife Action plan (SWAP) score (species' vulnerability):** **1A**=Scored 1 for vulnerability in at least one of eight vulnerability categories and matches at least one of the following: federally listed as E, T, or Candidate species; specifically covered under a signed conservation agreement or a signed conservation agreement with assurance; recently delisted federally and requires post-delisting monitoring;; closed-season species (i.e., no take permitted), as identified in Arizona Game and Fish; **1B**=Scored 1 for vulnerability, but matches none of the criteria listed under 1A; **1C**=Unknown status species.

The SGCN list identifies species of concern to the AGFD because their occurrence in Arizona is or may be in jeopardy. Its focus is the degree to which habitats or populations have been impacted and each species' probability of extirpation from Arizona. Known threats and documented population declines are now more important factors than limited distributions. The Arizona Species SGCN list reflects the best information available.

Many native plant species are afforded protection by the Arizona Department of Agriculture (ADA) under the Arizona Native Plant Law, and are categorized as highly safeguarded, salvage restricted, export restricted, salvage assessed, and harvest restricted (ADA 1994). Many plants that fall under the protection of the Arizona Native Plant Law including ironwood (*Olneya tesota*), mesquite, paloverde, ocotillo (*Fouquieria splendens*), and all species of cacti are known to occur at Luke AFB and AUX-1.

#### **2.3.4.1 Migratory Bird and Treaty Act**

The MBTA, a federal statute that implements four treaties with the U.S. and Canada, Mexico, Japan, and Russia, is designed to conserve more than 800 species of migratory birds (50 Code of Federal Regulations [CFR] 10.13). The MTBA prohibits the taking, killing, or possessing of migratory birds unless permitted by regulation. In 2003, the National Defense Authorization Act (Public Law 107-314) directed the Secretary of the Interior to exercise his or her authority under the MBTA to prescribe regulations exempting the Armed Forces from incidental take during military readiness activities authorized by the Secretary of Defense. Effective 30 March 2007, the USFWS issued a Final Rule authorizing the take of migratory birds resulting from military readiness activities, provided such activities do not have a significant adverse effect on a given population (USFWS 2007b).

Executive Order (EO) 13186 directs agencies to take certain actions that further strengthen migratory bird conservation under the conventions under the MBTA, the Bald and Golden Eagle Protection Act (BGEPA, 16 U.S.C. § 668, as amended in 1972) (hereafter referred to as the BGEPA) (USFWS 2007a), and other pertinent statutes. It requires establishing MOUs between the USFWS and other federal agencies. Accordingly, DoD and USFWS implemented an MOU in 2010 to promote the conservation of migratory birds (DoD and USFWS 2006). This MOU describes specific actions that should be taken by DoD to advance migratory bird conservation: avoid or minimize the take of migratory birds and ensure that DoD operations—other than military readiness activities—are consistent with the MBTA.

The Environmental Impact Statement (EIS) F-35A Training Basing Mitigation Plan for Luke AFB (USAF Air Education and Training Command 2013) also addresses migratory bird protection. The plan stipulates that, in the military training airspace, (1) existing flight restrictions concerning altitude and offset distances from sensitive species will be adhered to strictly, and (2) the quarter statute mile overflight avoidance of Mexican spotted owl activity centers will be maintained (as stated via informal consultation with the USFWS). The plan also stipulates that an open dialogue will continue between 56 RMO Airspace Managers and Environmental Science staff to (1) ensure compliance with biological opinions and identify/address any emerging issues associated with airspace use, and (2) ensure that protected owl-activity centers are charted and avoidances are described on in-flight guides for military training routes, respectively. Continued

monitoring/recording/tracking of deviations and noise complaints and communicate reported deviations with appropriate offices.

#### **2.3.4.2 Bald and Golden Eagle Protection Act**

In addition to the MBTA, the BGEPA prohibits any form of possession or take of bald or golden eagles (including any body part, nest, or egg) unless allowed by permit. The BGEPA defines take as “to pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.” On 14 December 2016, the USFWS issued a Final Rule (50 CFR Parts 13 and 22) revising the regulations on permits for incidental take of eagles and eagle nests to improve regulations clarity and improve compliance while maintaining strong protection for eagles. Revisions include changes to permit issuance and duration, definitions, compensatory mitigation standards, criteria for nest removal permits, permit application requirements, and fees (50 CFR Parts 13 and 22).

### **2.3.5 Wetlands and Floodplains**

#### **Luke AFB**

No wetlands have been identified at Luke AFB (CDM Federal Programs Corporation [CDMFPC] 1995). A drainage ditch located on the northern boundary of the base was found to support hydrophytic vegetation and there was evidence of wetland hydrology, but hydric soils were not present. A site must display evidence of all three wetland indicators to be considered a wetland or, in the case of a problem area (i.e., arid regions), hydric soil indicators are considered a constant factor during the drier times of the growing season (CDMFPC 1995).

#### **AUX-1**

There are no wetlands at AUX-1 (CDM Federal Programs Corporation [CDMFPC] 1995).

#### **Fort Tuthill**

There are no wetlands at Fort Tuthill.

### **2.3.6 Other Natural Resources Information**

Details of landscaped areas at Luke AFB are provided in section 7.7 of this document and in the Luke AFB Landscape Design and Maintenance Standards Plan (Sherman Group 2003).

### **2.3.7 Mission Impacts on Natural Resources**

Existing natural resources and outdoor recreation at Luke AFB, AUX-1, and Fort Tuthill are described in the following sections. Descriptions of existing conditions for this INRMP are based on information in the Field Survey Report (CDMFPC 1995) prepared in support of this INRMP and field investigations (Cristoffer 1994).

Potential impacts to natural resources due to facilities expansion or mission changes should be considered during planning. Management issues and concerns should focus on habitat for protected species, drainage concerns, and compatible land use.

To facilitate effective ecosystem management for Luke AFB, AUX-1, and Fort Tuthill, impacts on natural resources from activities carried out to meet the military mission must be understood and incorporated into a management framework. Biodiversity goals must be defined and objectives designed to meet those goals and should be integrated into management strategies. Data gaps should be identified and filled to ensure a comprehensive approach.

### **2.3.8 Land Use**

#### **Luke AFB**

Luke AFB, is comprised of 3,054 acres (owned) and 1,788 acres (under easement). The population of Luke AFB averages about 5,500, including military and civilian employees. The majority of Luke AFB is developed with military and military-support buildings. The operational portions of the base are controlled access areas, where only military personnel are permitted. These areas include, numerous hangars, radar and logistics areas, the munitions storage area, the fuels distribution and storage areas, the Armstrong and Avionics Laboratories, and generally all areas immediately adjacent to the tarmac. Military support facilities include dormitories, housing areas, medical facilities, hobby buildings, military retail facilities, warehouses, classrooms, offices, dining halls, leisure areas, and recreational buildings.

The undeveloped or semi-developed lands of Luke AFB include areas adjacent to the runways and surrounding the munitions storage area. These areas are designated as clear zones and will remain undeveloped as long as the fighter-training operations continue.

There is an 18-hole golf course occupying approximately 100 acres directly to the north of the main part of the base. The course has been planted with native grasses to control erosion and suppress dust. It was constructed as part of a project to control flooding at Luke AFB and nearby communities in agreement with Maricopa County Flood Control District. The golf course was designed to contain runoff from storm events of up to 100-year flows.

#### **AUX-1**

AUX-1 is currently used for precision-approach landing practice by jet-fighter aircraft. Fighter pilots approach the abandoned runway in landing mode and execute basic landing procedures, but they do not actually touch down on the surface during these maneuvers. The airspace above AUX-1 is labeled "Alert Area A-231—Concentrated Student Jet Transition Training" on the Phoenix Sectional Aeronautical Chart. This restricted zone encompasses the air space between 500 and 6,500 feet above ground level (AGL) (Dames & Moore 1994).

Most of the site is undeveloped land, with the exception of a radar facility and portable generator station. The radar facility and generator are used to support pilot training. The runways represent developed lands, even though they are not maintained and vegetation has grown into the asphalt. Other developments include a limited number of dirt roads; primitive areas cleared for bivouac facilities; parking; and a number of foxholes, trenches, and gun emplacements for personnel of Luke AFB and other military forces during field-deployment training.

## Fort Tuthill

Fort Tuthill, is approximately 14.5 acres in size and is used for lodging and outdoor recreation. The lower portion of the recreation area is developed, with little remaining vegetation typical of the natural ponderosa pine forest community. Fort Tuthill is essentially a campground with a variety of cabins, open spaces with *ramadas*, and a hotel.

### 2.3.9 Current Major Impacts

Most current and future impacts associated with military activities at Luke AFB are associated with the F-35A beddown and were analyzed in the 2012 *Final F-35A Training Basing Environmental Impact Statement* (EIS) (HQ Air Education and Training Command 2012). Construction started in 2013 and will continue through 2023. Construction for the beddown will occur on approximately 22.6 acres of previously disturbed area, primarily along the flightline. No long-term effects on vegetation and wildlife are anticipated. Revegetation of disturbed areas would be conducted with fresh landscaping. Construction activities are monitored as part of the F-35A EIS Mitigation and Monitoring Plan (USAF 2013). To date, no adverse effects to the natural environment have occurred from the F-35 support construction program.

Noise levels in the vicinity of Luke AFB are expected to be qualitatively similar to existing noise. Wildlife species on base live in a military airfield environment and are not expected to be adversely affected by changes in aircraft overflight and noise associated with the F-35A.

The impacts of low-level flying in the military operating area were analyzed in the *F-35A Training Basing EIS* (HQ Air Education and Training Command 2012). Based on the very low percentage of time spent in low-level flight by F-35As training within the airspace and on the previous and ongoing exposure of wildlife to training by other aircraft in the airspace, no significant adverse effects on vegetation or wildlife from overflights or noise are anticipated.

Recent environmental impacts at Luke AFB can be attributed to the construction of the 10-megawatt solar array that is located south of Super Sabre Street and west of the Munitions Storage Area. Luke AFB entered into an enhanced-use lease with Arizona Public Service, the base's provider of electricity, to build and operate the solar array on 107 acres of undisturbed land on the south side of the base. The entire 107 acres have been cleared to make way for the photovoltaic panels, with the exception of the major drainage west of the Munitions Storage Area that bisects the solar array. The drainage was conserved to maintain a microphyll (i.e., primitive plants with leaves that have one single, unbranched leaf vein) woodland, an important habitat type that support 90 percent of the birdlife, while occupying only five percent of the Sonoran Desert landscape (Dimmitt 2000). Environmental benefits of the solar array are expected to include an offset of 1,847 pounds/Megawatt hours (MWh) of CO<sub>2</sub> emissions and 491 gal/MWh of water consumption that would otherwise be generated/consumed by a coal-fired electric-generating facility. Construction of the solar array was completed in June 2016.

Growing evidence suggests that solar arrays may impact wildlife species; in particular, they may attract migratory shore and marsh birds. Although a study to understand the extent of impacts from

the array at Luke AFB has not been implemented, any species found near the solar array are documented and reported to 56 RMO staff.

### **2.3.10 Potential Future Impacts**

The projected transition from the use of fourth-generation aircraft (such as the A-10 and F-16) to fifth-generation aircraft (the F-35) will require Luke AFB to update and adapt facilities for proper maintenance, operation, and storage requirements. Ongoing construction needs will continue through 2023. To date, no adverse effects to the natural environment have occurred from the F-35 support construction program.

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## CHAPTER 3 ENVIRONMENTAL MANAGEMENT SYSTEM

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The USAF environmental program adheres to the Environmental Management System (EMS) framework and its “Plan, Do, Check, Act” cycle for ensuring mission success. EO 13693, *Planning for Federal Sustainability in the Next Decade*; DoDI 4715.17, *Environmental Management Systems* (DoD 2017c); AFI 32-7001, *Environmental Management*, with guidance changes (USAF 2017a); and International Standards guidance ISO 14001:2004 (International Organization for Standards 2004), provide guidance on how environmental programs should be established, implemented, and maintained to operate under the EMS framework.

The Natural Resources Programs employ EMS-based processes to achieve compliance with all legal obligations and current policy drivers by effectively managing associated risks, and instilling a culture of continuous improvement. The INRMP serves as an administrative operational control that defines compliance-related activities and processes.

The host command at Luke AFB is the 56 FW. The 56 FW enterprise includes Luke AFB, AUX-1, Fort Tuthill, BMGR East, and the Gila Bend AFAF. Within the boundaries of Luke AFB, there are a number of tenant units. The scope of Luke AFB’s EMS includes all the activities, services, and products associated with the operations of the 56 FW and tenants.

The 56 FW Civil Engineer Squadron/Civil Engineer Environmental Element (CES/CEIE) provides Luke AFB, AUX-1, Fort Tuthill, Gila Bend AFAF, and tenants with effective program management and technical oversight of all environmental aspects. The 56 RMO Environmental Science Management (ESM) (56 RMO/ESM) manages the natural and cultural resource aspects of BMGR East, while 56 CES/CEIE manages the other compliance aspects of BMGR East.

The Luke AFB ESM Commitment Statement reads as follows:

“The 56 FW enterprise is committed to building the future of airpower in an environmentally responsible manner. We will comply with all environmental regulations and AF [USAF] instructions, and strive for continual improvement in our environmental performance. This commitment encompasses the integration of sound environmental practices into our daily decisions and activities while recognizing the regional environmental concerns of air quality and water availability. In support of this commitment, we will:

- Set environmental goals, measure progress, and communicate results via the Cross Functional Team and Environmental, Safety, and Occupational Health Council.
- Maintain an effective sustainability program to minimize the generation of wastes and encourage recycling.
- Conduct regular environmental performance assessments, and develop plans to address noncompliance situations.

“Supporting this EMS commitment is the responsibility of every member of the Luke AFB community in accordance with his or her role and responsibilities in the organization.”

## CHAPTER 4 GENERAL ROLES AND RESPONSIBILITIES

General roles and responsibilities necessary to implement and support the Natural Resources Program are listed in the table below. Specific natural resources management-related roles and responsibilities are described in appropriate sections of this plan.

Table 4.1: General roles and responsibilities necessary to implement and support the Natural Resources Program.

Office/Organization/Job Title (not in order of responsibility)	Installation Role/Responsibility Description
<b>Installation Commander</b>	<p>The 56 FW Commander has delegated authority and oversight for all Luke AFB functions, including those occurring on all outlying and satellite areas.</p> <p><b>Roles and Responsibilities</b></p> <ul style="list-style-type: none"> <li>• Approve the INRMP by signature and certifies all INRMP revisions.</li> <li>• Ensure that the INRMP is consistent with the use of the installations to ensure the preparedness of the Armed Forces.</li> <li>• Control access to and use of natural resources.</li> <li>• Commit to seek funding and execute all “must fund” projects and activities within identified timeframe.</li> <li>• Provide appropriate staffing to execute INRMP implementation.</li> </ul>
<b>AFCEC Natural Resources Media Manager/Subject Matter Expert (SME)/Subject Matter Specialist (SMS)</b>	Advocate for resources and funding to implement approved INRMPs.
<b>Installation Natural Resources Manager/POC</b>	<ul style="list-style-type: none"> <li>• Support military training by managing the natural resources in accordance with applicable laws, executive orders, and directives.</li> <li>• Coordinate INRMP updates, revisions, and implementation requirements with applicable federal, state, and tribal government agencies, as well as nongovernmental organizations and parties.</li> </ul>
<b>Installation Security Forces</b>	N/A
<b>Installation Wildland Fire Program Manager</b>	N/A

Office/Organization/Job Title (not in order of responsibility)	Installation Role/Responsibility Description
<b>Pest Manager</b>	<ul style="list-style-type: none"> <li>• Serve as primary POC for all base pesticide use.</li> <li>• Assist natural resources staff with the safe, effective, economical, and environmentally acceptable management of pests.</li> </ul>
<b>Range Operating Agency</b>	N/A
<b>Conservation Law Enforcement Officer (CLEO)</b>	N/A
<b>National Environmental Policy Act/Environmental Impact Analysis Process (NEPA/EIAP) Manager</b>	Conduct NEPA/EIAP for all installation projects in coordination with the Natural Resources Managers.
<b>U.S. Forest Service</b>	<ul style="list-style-type: none"> <li>• Manage the Coconino National Forest surrounding Fort Tuthill.</li> <li>• Serve as the participating agency in the Greater Flagstaff Forest Partnership.</li> <li>• Coordinate with adjacent landowners (Fort Tuthill) to reduce wildfire risk and improve public safety and health through large-scale forest thinning and other fire-suppression activities.</li> </ul>
<b>U.S. Fish and Wildlife Service</b>	<ul style="list-style-type: none"> <li>• Serve as the implementing agency for the ESA, MBTA, and BGEPA.</li> <li>• Conduct Section 7 consultations and issue biological opinions as warranted.</li> <li>• Work with federal and non-federal partners toward recovery of listed species.</li> </ul>
<b>Arizona Game and Fish Department</b>	<ul style="list-style-type: none"> <li>• Provide primary jurisdiction over wildlife management, except where pre-empted by federal law.</li> <li>• Provide assistance for INRMP development and implementation through the 2015 Cooperative Agreement (USACE and AGFD 2015).</li> <li>• Develop and maintain habitat assessment/evaluation, protection, management, and enhancement projects.</li> <li>• Conduct wildlife monitoring.</li> <li>• Manage wildlife predators and recovery of protected species in accordance with the ESA, shared responsibility with the USFWS.</li> </ul>

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## CHAPTER 5 TRAINING

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USAF installation Natural Resource Manager/Point of Contact (NRM/POC) personnel and other natural resources support personnel require specific education, training, and work experience to adequately perform their jobs. Section 107 of the Sikes Act requires that professionally trained personnel perform the tasks necessary to update and carry out certain actions required within this INRMP. Specific training and certification may be necessary to maintain a level of competence in relevant areas as installation needs change or to fulfill a permitting requirement.

Training requirements and suggested trainings for Luke AFB natural resource support personnel are listed below.

- All natural resources managers are required to complete *DoD Natural Resources Compliance*.
- All personnel tasked with handling or managing protected species should complete *Interagency Consultation for Endangered Species* and/or other courses related to the ESA, MBTA, and BGEPA.
- Natural resource management personnel shall be encouraged to attain professional registration, certification, or licensing for their related fields and may be allowed to attend appropriate national, regional, and state conferences and training courses.
- All individuals who will be enforcing fish, wildlife, and natural resources laws on USAF lands must receive specialized, professional training on the enforcement of fish, wildlife, and natural resources laws in compliance with the Sikes Act. This training may be obtained by successfully completing the Land Management Police Training course at the Federal Law Enforcement Training Center (<http://www.fletc.gov/>).
- Individuals participating in the capture and handling of sick, injured, or nuisance wildlife should receive appropriate training, including training that is mandatory to attain any required permits.
- Personnel supporting the BASH program should receive flight-line drivers training, training in identification of bird species occurring on airfields, and specialized training in the use of firearms and pyrotechnics as appropriate for their expected level of involvement.
- The DoD-supported publication *Conserving Biodiversity on Military Lands—A Handbook for Natural Resources Managers* provides guidance, case studies and other information regarding the management of natural resources on DoD installations.

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## **CHAPTER 6 RECORDKEEPING AND REPORTING**

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### **6.1 Recordkeeping**

Military installations maintain required records in accordance with Air Force Manual 33-363, Management of Records (USAF 2008), and dispose of records in accordance with the Air Force Records Management System records disposition schedule (USAF 2018). Numerous types of records must be maintained to support implementation of the Natural Resources Programs. Specific records are identified in applicable sections of this plan, in the Natural Resources Playbook, and in referenced documents.

All natural resources-related documentation is stored and maintained at Building 500, Luke AFB. The 56 CES maintains a Geographic Information Systems (GIS) server for data, which resides in the 56th Comm Network Communication Center and is on the Non-classified Internet Protocol Router Network (NIPRNet).

### **6.2 Reporting**

The installation NRM is responsible for responding to natural resources-related data calls and reporting requirements. The NRM and supporting AFCEC Media Manager and Subject Matter Specialists should refer to the Environmental Reporting Playbook for guidance on execution of data gathering, quality control/quality assurance, and report development.

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## CHAPTER 7 NATURAL RESOURCES PROGRAM MANAGEMENT

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A primary goal of integrated natural resource planning is to maintain ecosystem integrity and dynamics without compromising the military mission. Maintaining healthy ecosystems promotes good stewardship by protecting existing biodiversity, ensures sustainable use of the facility, and minimizes management costs and efforts.

Goals are overall statements of what conditions are desirable within the installation. Objectives are more specific actions designed to meet the stated goals. Objectives are based on current and anticipated conditions. This INRMP must be reviewed over time to ensure that implementation of the objectives is proving effective in working toward achieving stated goals. As resource concerns arise and conditions change, or if goals are not being met, the objectives must be altered to meet those changing needs. The INRMP provides the flexibility to allow for such changes.

### 7.1 Fish and Wildlife Management

#### Applicability Statement

This section applies to USAF installations that require fish and wildlife management. This section **IS** applicable to Luke AFB, AUX-1, and Fort Tuthill.

#### Program Overview/Current Management Practices

Many of the flora and fauna surveys took place in the 1990s and are considered outdated. As a result, Luke AFB has approved funding for conducting surveys over the next five years. Survey results will be incorporated into this INRMP during the annual review process. The following outlines the planned projects to update the species and species habitat information within this INRMP.

##### FY 2018

- Bird species and migratory bird species survey
- Species, species at risk and candidate/concern species survey
- Habitat and vegetation classification survey

##### FY 2019

- Habitat and invasive species survey

##### FY 2020

- Habitat and invasive species survey

#### Luke AFB

Of primary importance to wildlife species currently occurring at Luke AFB is protecting and conserving portions of the base that support natural, undisturbed vegetation. The 56 CES Environmental Element at Luke AFB must be contacted before any ground-disturbing activities are authorized in these areas. If possible, future development should avoid the major drainage (west of the munitions enclosure) that supports microphyll woodlands and smaller patches of this valuable wildlife habitat type. In terms of wildlife diversity, these areas probably support the most species on

Luke AFB, providing food, cover, and relatively more water for wildlife than the adjacent desert scrub or disturbed areas. In particular, microphyll woodlands should be preserved, as they are likely to support more nesting bird species in comparison to adjacent areas. Microphyll woodlands represent an important resource for resident and Neotropical migratory birds, as well as various small mammals that forage on the seeds produced by the mesquite trees.

In addition to seeds, leaves from the rich ephemeral flora associated with the drainage area provide an important food source for herbivores. Many species of reptiles occur in these drainages, where forage (insects, fruits, green plants, and lizard prey) is more readily available. The protection and conservation of the remaining undisturbed desert scrub vegetation is also desirable. These areas support a host of small mammals, birds, reptiles, and amphibians, and they add an important habitat component for wildlife utilizing the contiguous wash areas. Future development or ground disturbing activities should be restricted to the relatively extensive areas that are already disturbed.

The base housing areas support a variety of large trees, shrubs, and herbaceous flowering plants that provide some foraging and roosting habitat for resident and Neotropical migratory birds. Current conditions should be maintained by replacing or replanting trees and shrubs lost to disease or storms. Native trees should be used to replace ornamental and other non-native trees that are lost (USACE 1994, Clark and Ingraldi 2017).

Ferruginous hawks and western burrowing owls, both protected by the MBTA, are observed at Luke AFB, but they are observed infrequently. The mowed areas around the runways at Luke AFB could provide suitable foraging habitat for ferruginous hawks. This is especially true in early fall and spring when the round-tailed ground squirrel, an important prey species, is active. Ferruginous hawks also have been observed on base in winter and may be attracted by Arizona cotton rats (*Sigmodon arizonae*) that can be found in this disturbed habitat.

Management of an area for special status wildlife species usually involves initiating techniques known to improve habitat and/or food resources for them. However, encouraging the ferruginous hawk population at Luke AFB also increases BASH issues. The goal of management at all USAF bases is to reduce the potential for bird/wildlife air strike hazards by discouraging birds to enter areas of aircraft operation (USACE 1994). As such, a change in maintenance procedures has been recommended to protect aircraft, pilots, and birds of conservation concern (USACE 1994). Any airfield maintenance activity that disturbs a relatively large area of ground (e.g., mowing, construction, etc.) should not be scheduled during hawk migration season (i.e., mid-August, October, November, February, March). Such activity would potentially attract more raptors to feed on rodents displaced by mowing into open areas of the base, which would increase the potential for an aircraft-bird strike and its catastrophic consequences to the pilot, aircraft, and bird (USACE 1994).

The presence of introduced feral animals can have a negative impact on native wildlife. The most prevalent feral animal species is the common house cat, which is found in the disturbed portions of Luke AFB and associated building structures. Feral cats have the potential to be serious pests at Luke AFB and negatively affect native wildlife and migratory bird species. The DoD requires that all cats be kept indoors to keep them safe and to prevent them from killing federally protected wildlife on

federal lands, which would be a violation of DoD's MOU with the USFWS to protect birds covered by the MBTA.

### **AUX-1**

Whereas much of AUX-1 is disturbed, important wildlife habitat does remain along the major drainages of this facility. These drainages support microphyll woodlands, which include small mesquite and blue paloverde trees important to Neotropical migratory birds and a variety of other wildlife species discussed in the previous section. All ongoing and future activities should avoid any ground-disturbing activities in these drainages. Ground-disturbing activities should be confined to previously disturbed areas of relatively low wildlife habitat value. These areas, have been mapped as forb, grass, and creosote bush mixed communities and account for the majority of the surface area at AUX-1. As such, there should be sufficient area to accommodate all ongoing and future training activity.

Deployed troops shall not shoot at, chase, scare, or in any other way harass wildlife at the AUX-1 site, including snakes, lizards, birds, or mammals.

### **Fort Tuthill**

Wildlife at Fort Tuthill should benefit from the proposed tree thinning, exotic plant removal, and wildflower plantings occurring at the area. A Watchable Wildlife program may be initiated at Fort Tuthill to enhance user enjoyment and expand recreational opportunities. Since there is no hunting allowed at Fort Tuthill, emphasis should be placed on non-game species. More specific objectives will be created in collaboration with the AGFD and other interested organizations.

Feral cats have the greatest potential to be serious pests at Fort Tuthill and have a negative impact on native wildlife and migratory bird species. To reduce the killing of birds and other wildlife, Luke AFB has initiated a live trapping and removal program for feral cats. All animals are captured humanely and turned over to the local Humane Society for care.

## **7.2 Outdoor Recreation and Public Access to Natural Resources**

### **Applicability Statement**

This section applies to USAF installations that have available recreational activities. This section **IS** applicable to Luke AFB, AUX-1, and Fort Tuthill.

### **Program Overview/Current Management Practices**

#### **Luke AFB**

There are limited outdoor recreational opportunities at Luke AFB. Military personnel and civilians interested in hiking, birdwatching, nature observations, and small game hunting should be directed to the larger natural areas available for these activities outside the installation.

**AUX-1**

Recreational activities at this site are restricted and generally not allowed because of potential interference with military field-training maneuvers. Moreover, field-training maneuvers could pose a threat to the health and safety of recreational users. If the operational status of AUX-1 were to change and safety of recreational users was not an issue, potential outdoor recreational activities available to the public could include hunting, hiking, off-road bicycling, rock hounding, nature photography, and birdwatching. Any small game hunting at AUX-1 would require a hunting license from AGFD.

**Fort Tuthill**

Presently, there is no permanent Watchable Wildlife program Fort Tuthill. Because the primary purpose of Fort Tuthill is to provide natural-resource based recreation for USAF personnel, it seems the most likely place to initiate such a program. One possibility is to make visitors more aware of the recreational opportunities on the county, state, and U.S. Forest Service lands adjacent to Fort Tuthill, where certain species such as elk and deer are more likely to be seen. There is an extensive network of hiking and bicycle trails within easy access to Fort Tuthill visitors, as well as other activities (Figure 7.1).



Figure 7.1: Nature trails can be found throughout the campgrounds at Fort Tuthill. Photo courtesy of Senior Airman Darlene Selmann.

**7.3 Conservation Law Enforcement****Applicability Statement**

This section applies to USAF installations that require conservation law enforcement. This section **IS NOT** applicable to Luke AFB, AUX-1, and Fort Tuthill. Natural Resources staff are supported by the 56th Security Forces Squadron. With regard to conservation law enforcement needs, the NRM coordinates with the Security Forces and USFWS and AGFD enforcement personnel, as necessary. USAF policy permits access to installations by federal, state, and local conservation personnel for enforcement duties.

**7.4 Management of Threatened and Endangered Species, Species of Greatest Conservation Need, and Habitats****Applicability Statement**

This section applies to USAF installations that provide suitable habitat and where sensitive species are known to occur. This section **IS** applicable to Luke AFB, AUX-1, and Fort Tuthill.

## Program Overview/Current Management Practices

Conclusions from past surveys indicate that there are no special-status plant or animal species at Luke AFB, AUX-1, or Fort Tuthill that reside and rely on resources at either site. The installation, however, is interested in updating its knowledge on the existence of resident and migratory birds, protected species, and species habitat and has secured funding for these surveys to occur over the next three years (FY 2018–2020). This section will be updated during annual reviews with the results of those surveys and any new management actions to be implemented if protected species or habitat are found.

Species protected by the MBTA or ESA and species listed by AGFD as SGCN are discouraged from occurring on the Luke AFB airfield to minimize the risk of BASH issues and the risk of protected species mortality. Whereas species protected by the MBTA and listed by AGFD as SGCN could occur at AUX-1, AFI 91-202 (USAF 2017d) clarifies that, to reduce BASH issues, airfields and the surrounding airfield environments are not to be managed as wildlife habitat. A U.S. Department of Agriculture (USDA) Animal Planet Health Inspection Services (APHIS) wildlife specialist monitors wildlife populations at and around the airfield and identifies and mitigates threats to aircraft.

Even though Luke AFB and Aux-1 are not managed as wildlife habitat, the 56 FW manages designated airspace over central and southern Arizona. The BMGR and surrounding federal and state lands provide a haven for wildlife dependent on undeveloped desert habitat. A thorough discussion of the species present in these areas and the management actions taken by Luke AFB to protect these species is discussed in detail in the BMGR INRMP (see Volume 1, Section 7.1 *Fish and Wildlife Management* and Section 7.4 *Management of Threatened and Endangered Species*). Actions to protect migratory birds covered by the MBTA and to reduce BASH issues are discussed in Section 7.12 *Bird/Wildlife Aircraft Strike Hazards*. Efforts for protecting bald and golden eagles that could be encountered during training activities are provided below in Section 7.4.1. *Bald and Golden Eagles*.

### 7.4.1 Bald and Golden Eagles

Since the 1990s when the bald eagle was listed under the ESA, pilots of military aircraft flown or managed by the 56 FW observe a 1-nautical-mile lateral separation around bald eagle breeding areas during the breeding season (December 1–July 15), in accordance with measures described in a 1994 biological opinion. Luke AFB also has been a committee member of the Southwestern Bald Eagle Management Committee since at least the 1990s and, in 2007, the 56 FW became an MOU signatory to the Conservation Assessment and Strategy for the Bald Eagle in Arizona.

After the bald eagle was delisted on 28 June 2007 and the 1994 biological opinion was no longer in effect, eagles nonetheless remained protected by the MBTA and the BGEPA. In 2013, the 56 RMO, with technical assistance from USFWS and AGFD, implemented two changes to the avoidance buffers around bald eagle breeding areas. First, the avoidance buffer during the breeding season was changed from 1-nautical-mile of lateral separation to 2,000 feet of lateral and vertical separation. Second, the breeding season is now observed from December 1 to June 30, in accordance with a 2006 Conservation Assessment, which was renewed in 2014. Because the bald eagle breeding window has been found recently at specific locations to extend past June 30 (especially at higher elevations where

nesting is initiated later in the spring), further evaluation and information may warrant consideration in altering this window for specific nesting sites.

Less is known about the avoidance measures needed for golden eagles that may be affected by military training activities. This lack of knowledge and updates to the BGEPA have increased the need for golden eagle nest monitoring in the southwestern desert region. In 2011, the Southwestern Golden Eagle Management Committee was formed and the 56 FW became a participant on that committee.

Beginning in 2006, AGFD began to investigate breeding golden eagle statewide distribution and status, which led to an improved understanding and the current ongoing monitoring effort (McCarty et al. 2017). In 2006, AGFD surveyed 85 previously known breeding areas (BAs), finding 14 were occupied by golden eagles (McCarty et al. 2017). From 2011 to 2014, the Department conducted statewide aerial occupancy and nest survey efforts for cliff-nesting golden eagles (McCarty et al. 2017). Building upon these survey results, the AGFD began assessing productivity at a subsample of known BAs in 2015 and 2016 (McCarty et al. 2017). After the 2017 season, there were 275 known golden eagle BAs, 46 historic BAs, and 474 potential BAs outside of Native American lands in Arizona.

The DOD also contracted with AGFD to design and implement a three-year study (2013–2015) evaluating possible impacts to golden eagles from airborne military training activities and compliance with BGEPA. The study has three primary objectives: (1) identify and survey the potential distribution of golden eagle breeding areas across military lands, (2) create a landscape-scale model to predict the likelihood of potential golden eagle nesting habitat, and (3) collect golden eagle demographic information and provide management recommendations that will permit BMGR and other southwestern military installations to maintain their training regimes while also complying with the BGEPA (Piorkowski et al. 2015).

The following actions were recommended for implementation.

- Continue monitoring known, potential, and historic golden eagle nests on military installations.
- Coordinate with local, state, and regional authorities on current golden eagle distribution and status to inform current and future military activities for compliance with BGEPA.
- Develop avoidance buffers around known golden eagle nests during the breeding season, specifically those that were occupied within the last five years.
- Avoid disturbance around potential and historic golden eagle nests during the early (pre-incubation, incubation, and nests with nestlings <4 weeks of age) breeding season. Potential nest sites are described as those that provide suitable nest-site structure but where no golden eagles have been previously observed. Historic nests are sites that were used by golden eagles in the past, but have had no occupancy for the most recent decade. Normal military training activities can resume in the area once all potential or historic nests have been deemed unoccupied for a given breeding season.
- Avoid heavy ground and aerial disturbance during the early breeding season within habitat predicted by the habitat model as having a high likelihood of being potential golden eagle nesting habitat. By using precise modeling, reducing heavy disturbance activities in areas of

high likelihood may reduce or eliminate incidental take even if surveys to document nesting golden eagles have not been completed in those areas. Future model validation should allow quantification of thresholds associated with high likelihood habitat in the modeled estimates.

There is a current effort underway (via contract between USAF and the Colorado State University's Center for Environmental Management of Military Lands) to compile and standardize all historical locations of eagle nests and associated data for a subset of Air Force installations in the western U.S., including Luke AFB and BMGR. All nest locations recorded on installations after project completion should be shared with the AGFD. Likewise, periodically BMGR and Luke AFB will request all eagle nest data recorded by AGFD within the military operating area. The project products will include recommendations for compliance with BGEPA, including monitoring eagle populations, behaviors, and productivity; mitigating disturbance; and assessing the risks associated with overhead utility infrastructure. Meanwhile, the 56 FW observes the same buffer parameters for golden eagle nests as it does for bald eagle nests (territories occupied within the most recent decade): 2,000 feet of lateral and vertical separation from December 1 to June 30. As new information about sensitive areas is acquired, it will be provided to the 56 RMO Airspace Manager, who updates the GIS layers with the new data, displays all the sensitive species areas on maps, and shares the maps with trainees so that these sensitive areas may be avoided during crucial times and/or seasons.

## 7.5 Water Resources Protection

### Applicability Statement

This section applies to AF installations that hold water resources that require protection to maintain the integrity of the watershed. This section **IS** applicable to Luke AFB, AUX-1, and Fort Tuthill.

### Program Overview/Current Management Practices

Surface water at Luke AFB is very limited. There are no perennial or intermittent streams present on the base. Surface water at Luke AFB generally drains along a stormwater drainage network to the south side of Glendale.

The following objectives are set forth to achieve the goal of protecting watershed integrity. Luke AFB is actively pursuing these objectives.

- Continue to restrict aircraft washing to the wash rack.
- Conduct bioremediation of oil/water separators.
- Continue to work with shops to implement best management practices.
- Inspect outfalls during/after rain events that result in discharges.
- Continue to issue Wastewater Treatment Plant Discharge Permits.
- Conduct monthly reviews of Wastewater Treatment Plant operations.
- Conduct monthly reviews of discharge monitoring reports.
- Implement a Water Conservation Program.
- Reduce water usage.
- Convert turf areas to xeriscape.

- Incorporate LEED water conservation strategies at New F-35 facilities.

## 7.6 Wetlands Protection

### Applicability Statement

This section applies to USAF installations that have identified wetlands that require protection. This section **IS NOT** applicable to Luke AFB, AUX-1, and Fort Tuthill.

### Program Overview/Current Management Practices

Even though no wetlands have been identified at Luke AFB, AUX-1 or Fort Tuthill (USACE 1995), in practice any drainage that functions to transport water and has a discernable high-water mark can qualify as a U.S. Water. Developing such drainages would require obtaining a permit from the USACE, pursuant to Section 404 of the Clean Water Act if dredge or fill material is discharged into the drainage (33 U.S. Code § 1344). The Nationwide 26 Permit is applicable if less than an acre of a U.S. Water is affected. When 1–10 acres are affected, it is discretionary as to whether a Nationwide or Individual Permit is required. The determination takes into account whether potential impacts are considered minor or major. An individual permit is required when more than 10 acres are effected. Before any proposed projects that would entail development in washes or small drainages are initiated, the Environmental Flight should be notified so they can consult with the Arizona Area Office of the USACE (Los Angeles District), Regulatory Branch, with regard to permit requirements for the action.

While Fort Tuthill does not include any wetland areas, at times there may be large amounts of runoff during storm events from the steep slopes on that property. Recommendations include monitoring such events to determine the necessity and feasibility of constructing stormwater retention facilities to prevent or mitigate damage.

## 7.7 Grounds Maintenance

### Applicability Statement

This section applies to USAF installations that perform ground maintenance activities that could impact natural resources. This section **IS** applicable to Luke AFB, AUX-1, and Fort Tuthill.

### Program Overview/Current Management Practices

A majority of Luke AFB is developed with office and residential buildings; air fields; and recreational facilities (i.e., Falcon Dunes Golf Course). These areas account for approximately 91 percent (about 2,650 acres) of the total Luke AFB land area. Landscaping and grounds maintenance across the developed portions of Luke AFB provide environmental, economic, and social benefits. These benefits, as outlined in the Luke AFB Urban Forest Inventory and Urban Forest Management Guidelines (Clark and Ingraldi 2017), are listed below.

- Economic—Landscaping increases property value, reduces cooling costs, increases economic stability, increases community and business district appeal, reduces expenditures on gray infrastructure, and increases the lifespan of pavement.
- Environmental—Landscaping reduces greenhouse gasses, the urban heat island effect, energy consumption (i.e., cooling), and stormwater pollution; improves air and water quality; and provides wildlife habitat.
- Social benefits—Landscaping provides shade for outdoor activities, serves as a sound buffer by reducing noises, and generally increases the quality of life for military personnel and families living and working at Luke AFB.

USAF policies and guidelines regarding grounds maintenance and urban forest management are included under “Land Management” in Chapter 11 of AFI 32-7064 (USAF 2016a). In general, AFI 32-7064 states that installations should design and implement landscaping that emphasizes the use of native plants, minimizes chemical usage and encourages pollution prevention, promotes designs that minimize adverse impacts to natural resources, and implements landscape designs that reduce maintenance and input costs associated with energy, water, chemicals, labor, and equipment needs. To comply with AFI 32-7064, Luke AFB has developed and implemented several management plans to govern ground maintenance and urban forest management activities at the installation. These plans are listed below.

- Luke AFB Landscape Design and Maintenance Standards (Sherman Group 2003)
- Urban Forest Inventory and Urban Forest Management Guidelines for Luke AFB (Clark and Ingraldi 2017)
- Luke AFB IPMP (Luke AFB 2015)
- Stormwater Pollution Prevention Plan (SWPP) for Luke AFB (CH2MHILL 2012)
- Falcon Dunes GEM Plan for Luke AFB (Air Force Center for Engineering & the Environment 2011)

The Luke AFB Landscape Design and Maintenance Standards Plan (Sherman Group 2003) defines the roles, standards, and guidelines for grounds maintenance at the installation. In general, the plan defines the approved plant material list with planting specifications for all turf and ornamental species, mowing and pruning requirements, irrigation duration and frequency requirements—by species—for all seasons, and approved design specifications for all landscaped areas. Grounds maintenance is performed by private landscaping companies through service contract agreements.

### **General Maintenance Issues Associated with Turf Areas and Ornamental Planting Areas, Such As Disease, Insect, or Invasive Species**

The Luke AFB IPMP (Luke AFB 2015) discusses the roles, responsibilities, and protocols for grounds maintenance associated with pest management at Luke AFB, including the Falcon Dunes Golf Course. The stated goal of this plan is attain 100 percent control of turf and ornamental weeds on Luke AFB property through a variety of chemical and mechanical treatment methods. Implementation of the plan falls under the landscape maintenance responsibilities of the National Construction & Maintenance program. Luke AFB utilizes a comprehensive integrated pest management approach to weed and pest control that takes into account the various chemical, physical, and biological

suppression techniques available. The program also calls for analyzing the weed or pest habitat and its interrelationship with the ecosystem. Every attempt is made to use the lowest percentage of active-ingredient herbicides possible to attain control and to also prioritize the use of mechanical weed control methods over chemical application wherever practical.

A variety of weeds impact the turf and ornamental areas at Luke AFB. These weeds are controlled through the use of periodic pre-emergent and post-emergent herbicide applications designed to protect high value landscape resources. Isolated weed patches are also controlled by mechanical means such as hoeing and hand pulling. Pest impacting Luke AFB turf and ornamentals areas include gophers and rodents. Weeds impacting the Falcon Dunes Golf Course include annual bluegrass (*Poa annua*), goose grass (*Eleusine indica*), clover (*Trifolium* spp.), and nut grass (*Cyperus* spp.). Pest species impacting the golf course include Green June beetles (*Cotinis nitida*), cutworms, and Rove Beetles (Staphylinidae). Disease issues are not a common at either Luke AFB or the Falcon Dunes Golf Course and are treated on a case by case basis. The Luke AFB IPMP (2015) provides management recommendations for each of these weed/pest species and disease issues. More information regarding the Luke AFB Integrated Pest Management (IPM) program can be found in section 7.11 of this plan.

### **Non-Point Source Pollution Issues Associated with Landscape Pesticides and Fertilizers**

To prevent impacts from non-point source pollution, Luke AFB has developed and implemented a SWPP (CH2MHill 2012) covering the entire Luke AFB installation area. The SWPP provides best management practices (BMPs) for landscaped areas. It is designed to limit water-quality impacts associated with landscaped areas and specifically addresses issues associated with the use of pesticides and fertilizers. Practices recommended under this plan include the BMPs, as follows.

- Properly dispose of landscape waste and sediments.
- Minimize the use of pesticides, herbicides, and fertilizers and follow all label directions.
- Utilize an integrated pest management approach.
- Reduce the need for irrigation by using native, drought-resistant, plants and select plant materials requiring little maintenance and pest control.
- Incorporate landscaping into stormwater detention/retention areas to reduce peak runoff, promote infiltration, and improve water quality.

### **Programs Handling Solid Waste**

The Integrated Solid Waste Management program at Luke AFB is managed by the 56 CES with the primary goal of effectively managing municipal solid waste and construction and demolition waste generated at Luke AFB. This program is guided by the Luke AFB Integrated Solid Waste Management Plan (ISWMP) (Luke AFB 2016) and the Luke AFB Qualified Recycling Program Business Plan (Luke AFB 2016). AFI 32-7042, with change 1 (USAF 2017b), requires installations to implement the program in the most cost-effective manner possible while meeting all applicable USAF, DoD, federal, state, and local laws and requirements. Specific goals of the Integrated Solid Waste Management program, as outlined in the ISWMP (Luke AFB 2016), are listed below.

- Continuously reduce the quantity of non-hazardous solid waste generated and increase the percentage of non-hazardous solid waste diverted from disposal facilities to help meet established solid waste diversion goals.
- Increase the economic benefit of solid waste management.
- Maintain compliance with applicable Air Force, DoD, federal, state, and local solid waste management requirements and laws.
- Increase participation in the installation's qualified recycling program and maximize solid waste diversion through recycling.
- Promote source reduction and reuse practices to reduce waste generation.
- Promote environmentally preferable procurement to close the recycling loop.

The ISWMP (Luke AFB 2016) identifies sources of solid waste on the installation and outlines BMPs for reducing the amount of waste generated. Solid waste collection from commercial, institutional, and industrial areas, along with military family housing areas, are provided by contractors through separate solid waste collection and disposal contracts. Since Luke AFB does not operate an on-site landfill, all waste disposal is provided at a local landfill. The Luke AFB ISWMP is reviewed annually and will be updated by the program manager as required.

### **Urban Forestry Management Program**

As part of the Natural Resource Program at Luke AFB, the Urban Forest Inventory and Urban Forest Management Guidelines (Clark and Ingraldi 2017) was developed and implemented in 2016. All trees and saguaros located within the improved portions of Luke AFB were inventoried as part of this project. Information collected for each tree include location, species, diameter-at-breast-height, height, and general health condition of the specimen. The health of each specimen was determined through visual examination and an assessment of coloration/discoloration evidence of decay and die-back; root characteristics; trunk, branch, and canopy structure; condition of the foliage; and any evidence of disease or pest issues. Each specimen was given a rating of good, fair, poor, or dead. In total, 5,184 trees representing 68 species were assessed and mapped at Luke AFB and these data were summarized, forming the basis of the Luke AFB Urban Forest Management Plan (Clark and Ingraldi 2017).

The Management Guidelines provided recommendations and short- and long-term action items for urban forest management at Luke AFB. These action items, as identified in Clark and Ingraldi (2016), include both short- and long-term actions.

#### **Short-Term Action Items**

- Start developing the base-wide management plan.
- Retain all saguaros when renovations and development occur, whenever possible. Notably, retain large, old-growth saguaros with multiple arms, given that old-growth saguaros often contain the most cavities potentially suitable for smaller birds to nest in and the external structural complexity to support stick nests for larger raptors. The tree inventory data will be used to inform NRMs and other individuals involved with planning and construction

whether to allow development around an existing saguaro or, when feasible, to move at-risk saguaros to a new location on base.

#### Long-Term Action Items

- Increase the fiscal budget for urban and community forestry operations.
- Increase the number of saguaros through plantings.
- Increase the number of trees to increase shade (i.e., reduce energy consumption and the urban heat island effect, provide cooler temperatures for workers and residents), conserve more water (native species are already adapted to local dry conditions), provide more and safer walkable space outdoors for workers and residents, and replace those trees being eliminated by harsh weather and deleterious maintenance operations.
- Increase the diversity of tree species when planting.
- Increase the number of native tree species to support and encourage native wildlife diversity and declining native species (e.g., Gila woodpecker [*Melanerpes uropygialis*], gilded flicker [*Colaptes chrysoides*], lesser long nosed bat [*Leptonycteris yerbabuenae*], western yellow bat [*Lasiurus xanthinus*]).
- Increase the number of different age classes of trees to ensure cohorts are being replaced regularly and mature flowering individuals of a given species are present at all times. Currently, there is an inadequate number of younger trees to replace the aging veterans when they eventually succumb to old age.
- Remove (cut and spray) invasive salt cedar (*Tamarix* spp.).
- Develop a list of current tree management and subsequent maintenance concerns, issues, and needs.
- Inspect trees periodically and perform systematic trimming of trees containing hazardous defects (structural problems, disease, or vandalism).
- Remove hazard trees on public right-of-ways.
- Establish a routine systematic trimming cycle for all trees along the right-of-ways (e.g., clear traffic signals and signs, street lights, pedestrian and vehicular traffic, and buildings).
- Develop working partnerships with local and regional utilities, agencies and organizations, and the local community to improve the effectiveness and efficiency of urban and community forestry operations.
- Identify potential partners for urban and community forestry programming in the community.
- Conduct a community survey to increase awareness and obtain feedback on the appropriate tree species to plant and those to avoid, based on personal experiences within the community.
- Potentially work toward the development of a community Tree Board to provide guidance and recommendations to Luke AFB for care and maintenance of the community forest.
- Increase public education and involvement in the planning, care, and maintenance of the community trees.
- Inform the public of on-going efforts and long-term management strategies for tree recovery after storms or other catastrophic events.
- Work with state highway and transportation agencies on developing standards and criteria for care of trees growing along roadways.

- Develop a comprehensive set of specifications for contracted services.
- Provide training to in-house personnel on all phases of urban and community tree care.
- Continue to update the inventory of all trees, using state of-the-art technology and mapping methods.

A complete list of recommended plants for landscaping in turf and ornamental areas is included in the Luke AFB Landscape Design and Maintenance Standards Plan (Sherman Group 2003). The list includes 37 tree, shrub, and groundcover species. Prohibited species at Luke AFB include all 88 regulated, restricted, or prohibited noxious weeds listed for the State of Arizona, as provided by the ADA, Plant Services Division Administrative codes R3-4-244, *Regulated and Restricted Noxious Weeds*, and R3-4-245, *Prohibited Noxious Weeds* (ADA 2017).

### **Golf Course Environmental Management (GEM) Plan**

The GEM Plan was developed to provide environmental management guidelines at the Falcon Dunes Golf Course (Air Force Center for Engineering & the Environment 2011). This plan complies with the USAF Golf Course Environmental Management GEM program and AFI 32-7064 (USAF 2016a), which requires a GEM Plan as part of the INRMP process. The Falcon Dunes GEM Plan provides guidelines and BMPs for all aspects of environmental management at the golf course, including water use/supply, erosion, stormwater/water quality, BASH concerns, air quality, and floodplain management. Additionally, the plan details short and long-term work plan actions, as listed below.

#### **Short-Term Action Items**

- Create, utilize, and collect scouting forms to guide future pest control decisions.
- Continue with planned activities for regular maintenance.
- Prune as many trees as possible during winter

#### **Long-Term Action Items**

- Compile and implement a Tree Management Plan for the entire facility.
- Compile and implement a comprehensive Golf Course Water Resource Management Plan to include a Drought Management Plan and Water-Quality Management Zones for the entire facility.
- Utilize a handheld global positioning system unit to assist with mapping the course and improving overall stewardship and management practices.
- Aerate all playing surfaces, per regular maintenance plan.
- Continue employee environmental, safety, and occupational health training and education programs, per course work plan.

## **7.8 Forest Management**

### **Applicability Statement**

This section applies to AF installations that maintain forested land on USAF property. This section **IS NOT** applicable to Luke AFB, AUX-1, and Fort Tuthill.

**Program Overview/Current Management Practices**

No commercial forestry activities occur at Luke AFB, AUX-1, or Fort Tuthill. Urban forest management is covered in Section 7.7, *Grounds Maintenance*.

**7.9 Wildland Fire Management****Applicability Statement**

This section applies to USAF installations with unimproved lands that present a wildfire hazard and/or that utilize prescribed burns as a land management tool. This section **IS NOT** applicable to Luke AFB, AUX-1, and Fort Tuthill.

**Program Overview/Current Management Practices****Luke AFB**

Luke AFB contains approximately 287 acres of unimproved land across three main areas (Figure 2.1). Dissecting these areas are several roads and drainage ditches that would serve as fire breaks in the event of wildfires. Moreover, the low densities of desert vegetation found in these areas (described in section 2.3.1) typically do not provide sufficient fuel to carry a fire over a large area. The installation is located between extensive urban development to the east and south and agricultural lands to west and north. Based on these three factors, the risk of wildfire impacting Luke AFB is very low.

**AUX-1**

AUX-1 encompasses approximately 900 acres of unimproved land dissected by numerous roads and air strips that could serve as fire breaks in the event of a wildfire (Figure 2.2). The unimproved land is dominated by widely spaced desert shrublands; the bare spaces between the shrubs and small trees can limit a fire's ability to spread. AUX-1 is completely surrounded by similar desert shrubland habitats, with the exception of an irrigation canal to the north and west. Based on these factors, the risk of wildfire impacting AUX-1 is very low.

**Fort Tuthill**

Only 2.5 acres of the 14.5 total acres at Fort Tuthill contain unimproved lands, with these lands being dominated by ponderosa pine forest (Figure 2.3). Fort Tuthill is used as a recreation and camping area by military personnel and includes a hotel, several cabins, A-frames, yurts, and RV and camping areas. Almost all of Fort Tuthill is surrounded by ponderosa pine forest managed by the Coconino County Parks & Recreation Department, the State of Arizona, and the Coconino National Forest. Coconino County is undertaking a large-scale forest thinning project aimed at improving forest health and public safety and reducing wildfire risk. Eventually, an estimated 220 acres will be treated under this project, including all unimproved lands immediately surrounding Fort Tuthill (Figure 2.3). In addition, Coconino National Forest lands to the south and west also have been thinned aggressively, reducing wildfire risk across the entire area. These projects are part of the larger Greater Flagstaff Forest Partnership, an alliance of private businesses, environmental groups, and governmental

organizations aiming to restore natural ecosystem function, manage fuels, and reduce the probability of catastrophic wildfires within ponderosa pine forest surrounding Flagstaff, Arizona (Greater Flagstaff Forest Partnership 2017).

Given the small size of Fort Tuthill, wildfire risk mitigation and management relies almost completely on the actions of surrounding land management agencies. Given this, Luke AFB personnel should keep in contact with these land management agencies and support all efforts to reduce wildfire risk on adjacent lands across the area. Management actions currently being implemented to reduce wildfire risk at Fort Tuthill include maintaining vegetation around camp sites, specifically around designated campfire areas, as well as implementing fire restrictions during times of high fire danger.

## 7.10 Agricultural Outleasing

### Applicability Statement

This section applies to USAF installations that lease eligible USAF land for agricultural purposes. This section **IS NOT** applicable to Luke AFB, AUX-1, or Fort Tuthill.

### Program Overview/Current Management Practices

No agricultural outleasing programs are currently being administered at Luke AFB, AUX-1, or Fort Tuthill.

## 7.11 Integrated Pest Management Program

### Applicability Statement

This section applies to USAF installations that perform pest management activities in support of natural resources management (e.g., invasive species, forest pests, etc.). This section **IS** applicable to Luke AFB, AUX-1, and Fort Tuthill.

### Program Overview/Current Management Practices

EO 13751 (EO 2016) requires federal agencies to identify actions that may affect invasive species; use relevant programs to prevent introductions of invasive species; detect, respond, and control such species; monitor invasive species populations; provide for restoration of native species; conduct research on invasive species; and promote public education. An invasive species, as defined in EO 13751, is a “...non-native organism whose introduction causes or is likely to cause economic or environmental harm, or harm to human, animal, or plant health.” To comply with EO 13751, Luke AFB has implemented an IPM program guided by the Luke AFB IPMP (Luke AFB 2015). Luke AFB utilizes a comprehensive IPM approach to weed and pest control, which takes into account the various chemical, physical, and biological suppression techniques available and the weed’s or pest’s habitat and its interrelationships within the ecosystem. Pest and weed management records are retained within the Integrated Pest Management Information System program and includes management actions covering in-house applications, contractor applications, and golf course

applications. Adherence to the Luke IPMP will ensure compliance with all applicable DoD, USAF, federal, and State of Arizona laws and regulations.

The IPMP (Luke AFB 2015) outlines the roles and responsibilities for groups implementing the IPMP at Luke AFB, as listed below.

#### Civil Engineer Squadron Commander

- Provide oversight and support of all installation pest management programs in accordance with DoD, federal, state, and legally applicable host nation laws.
- Provide facilities, equipment, and pesticides in accordance with DoDI 4150.07 (DoD 2017a).
- Provide the appropriate number of certified pest management personnel according to DoDI 4150.07 and USAF manpower standards to support contingency and installation requirements.
- Provide financial resources for operations and training to meet installation and contingency pest management requirements.
- Select (in writing) an installation pest management coordinator.
- Review and approve installation pest management plans and contracts.
- Provide pest management support for installation facilities, grounds, and airfield BASH mitigation measures, range operations, golf course maintenance (in accordance with AFI 65-106 [USAF 2009]; Appropriated Fund Support of Morale, Welfare, and Recreation; and Non-appropriated Fund Instrumentalities), recreation areas, etc.

#### Installation Pest Management Coordinator

- Oversee the development of installation pest management plans, collect and report data on all installation pesticide use, review contract specifications, and serve as the primary POC for all installation pesticide compliance.
- Work closely with other civil engineers, services, medical personnel, and the Major Command Pest Management Consultants to produce an effective pest management program.
- With assistance from the installation Natural Resources office, coordinate with federal, state, installation, local pest management, and wildlife personnel as necessary.

The plan also outlines the priorities for pest management work and details the health and safety protocols for implementing the IPMP. Environmental considerations covered under the Luke IPMP include protection of the public, pesticide reduction/measures of merit, pesticide spills and remediation, and endangered or protected species and critical habitats in the sections that follow.

### Protection of the Public

Precautions are taken during pesticide application to protect the public, both on and off the golf course. Signs are used to indicate areas of pesticide applications at the golf course and are posted at the 1st and 10th tees. These signs are left displayed until the chemical label re-entry times are satisfied. Whenever pesticides are applied outdoors, care is taken to ensure that any spray drift is kept away from individuals, including the applicator, and non-targeted areas. As a rule, pesticides are not applied outdoors when wind speeds exceed 10 miles per hour. At no time are personnel permitted into a treatment area during pesticide application unless they have met the medical

monitoring standards and are wearing proper personal protective equipment. Sensitive Areas, such as medical facilities and child care centers, require extra precautions on where and how pesticides are applied around them.

### **Pesticide Reduction/Measures of Merit**

The pest management shop continues to keep the pesticide usage low at Luke AFB by applying pesticides only as a method of last resort. In general, very little active-ingredient pesticide is used at Luke AFB.

### **Pesticide Spills and Remediation**

The Spill Prevention and Response Plan (CH2MHILL 2012) accounts for pesticide spills at pest management storage and mixing facilities and elsewhere on the base. Each shop has a site-specific spill plan, and the base's fire plan (Luke AFB 2015) for these facilities takes pesticide storage into account.

### **Endangered or Protected Species and Critical Habitats**

The Luke AFB natural resource program uses pesticides or IPM techniques to control undesirable vegetation, urban wildlife, and animal damage. Prevention of harm to threatened and endangered species and environmentally sensitive areas is coordinated through the 56 CES/CEIE (Natural Resource Management Element). Pesticide label directions regarding environmentally sensitive areas are strictly enforced. Whenever pesticide application occurs in proximity to threatened and endangered species, the USFWS will be consulted.

A variety of pests affect natural resource management at Luke AFB. As outlined in the Luke AFB IPMP (2015), they include public health pests, animal and insect pests, structural pests, and undesirable vegetation, as described below.

### **Public Health Pests**

Mosquitoes present a concern to USAF personnel given the variety of diseases they can transmit to humans. Both pest management and public health personnel on the installation conduct mosquito breeding site surveys throughout the summer season. Peak mosquito breeding season at Luke AFB typically coincides with the summer monsoon season, when flash floods tend to create areas of standing water, providing an optimal breeding habitat for mosquitoes. The decision to implement mosquito management actions are based on larval surveys, adult trap counts, and customer complaints. While pest management personnel keep pesticides on hand for larval and adult mosquito control, efforts are first concentrated on available cultural, mechanical, and biological control options, as well as customer education, before pesticide application occurs. Management options to control mosquito populations on base are listed below.

- Control and remove areas of standing water.
- Introduce biological predatory fish to areas of standing water.
- Treat areas of standing water with Bactimos Briquettes.
- Spot treat with pesticides along ditch banks and other areas where mosquitoes congregate.

- Conduct fogging in the event that the mosquito problems become severe.

### **Animal and Insect Pests**

*Rodents*—Rodents that directly impact the natural resources program at Luke AFB include gophers (Geomysidae) and ground squirrels (Sciuridae). These pests can impact turf and ornamental areas and can become BASH concerns because they serve as a food source for a variety of bird and raptor species. Management options for controlling rodent populations include trapping and the use of pesticides. Currently, the most effective control method is trapping using the Gophinator gopher trap. Gophers and ground squirrels are trapped on an as-needed basis.

*Coyotes*—Coyotes frequent the Luke AFB area. These animals can be a danger to people and they present a substantial BASH hazard if they get on the air field. Coyotes are typically shot by pest management personnel and removed from the installation. Shot guns are utilized for these depredation events and they are held in the armory by security forces. Security forces must be notified prior to implementing a depredation activity. Pest management personnel performing the depredation activity must also be certified to use a shot gun and have their name on the ammunition storage letter to retrieve the weapon. Animals that are on or near the flight line are handled by USDA staff or Airfield Management Base Operations personnel.

*Insects*—Bees, wasps, and hornets are occasionally removed from Luke AFB grounds. Management options include spot treatment and nest removal when the insects present a danger to USAF personnel or their families. Because they are valuable pollinators for native plant species, chemical control options are avoided, if possible.

*Snakes*—Rattlesnakes (*Crotalus* spp.) frequent the base and can be a threat to personnel. Rattlesnakes are also important to the natural resources program, as they reduce rodent issues, which in turn reduces the BASH threat. One way to discourage snakes is to remove harborage areas for rodents in proximity to buildings and other structures. Additionally, exclusion methods can be used to limit snake/people confrontations. When snakes are found in areas near where people are likely to be, snake tongs are used to remove them and place them in a secured, locked transportation box. Rattlesnakes are typically relocated to the west side of the base.

*Feral Cats*—The presence of feral cats is a concern to the Luke AFB natural resource program, as they can have a substantial negative impact on native wildlife and migratory bird species. Feral cats are common in the disturbed portions of Luke AFB and associated buildings. The DoD urges that all cats be kept indoors to keep them safe and to prevent the killing of federally protected wildlife species on federal lands. A feral cat killing a protected species would violate the DoD's MOU with the USFWS, which requires installations to protect bird species covered under the MBTA.

## Structural Pests

Subterranean termites are a severe problem at Luke AFB. Termite inspections are performed every two years as time and funding allow. When an active termite infestation is found, the area is spot treated by contractors. In addition, all new construction sites are pretreated for termites after the new construction statement of work is approved by AFCEC/Chief of Staff Committee. Other structural pests found at Luke AFB include carpenter bees and carpenter ants, which have been treated on a limited basis.

## Undesirable Vegetation

*Grounds*—All mowing and trimming is accomplished by contract. All herbicide use is reported to the pest management shop through the Service Contract's Section on Quality Assurance Evaluations. The grounds contractor is responsible for treating approximately 95 acres of improved grounds at Luke AFB. All contracts require a plan for the application of pre-emergent herbicides for controlling annual weeds. Contact and systemic herbicides are also used for post-emergence spot treatment.

*Electrical Substation Area*—The pest management office is responsible for spot treatments of weeds at electrical substations, generally using a contact or systemic herbicide.

*Facilities*—Facility managers are responsible for weeds within 25 feet of their buildings. The Pest Management shop will mix and issue herbicide (glyphosate) in a 1- to 2-gallon tank sprayer for these applications.

*Airfield Pavements*—The airfield consists of approximately 267 acres of concrete and asphalt pavements. Portions of the asphalt have degraded and weeds are growing through the pavement. A variety of crack and joint sealing products and herbicide sterilants have been used to reduce vegetation growth on airfield pavements.

*Golf Course*—Pest control, as it relates to golf course turf management, is the responsibility of the lead golf course groundskeeper. All pesticide usage at the golf course is reported and reviewed by the pest management foreman.

*Noxious or Invasive Plants and Animals*—There are 88 regulated, restricted, or prohibited noxious weeds listed for the State of Arizona by the ADA, Plant Services Division, within their Administrative codes R3-4-244, Regulated and Restricted Noxious Weeds, and R3-4-245, Prohibited Noxious Weeds (ADA 2017).

## Fort Tuthill

Noxious weeds affecting Fort Tuthill include Dalmatian toadflax (*Linaria dalmatica*) and common mullein (*Verbascum thapsus*). Possible pest species impacting the ponderosa pine forest include dwarf mistletoe (*Arceuthobium vaginatum*) and bark beetles (*Dendroctonus* spp.). Given the small area of Fort Tuthill and the disturbed nature of the ponderosa pine forest there, impacts from these weed and pest species is expected to be low. Other invasive species could, however, become problematic in the future and should be monitored.

## 7.12 Bird/Wildlife Aircraft Strike Hazard (BASH)

### Applicability Statement

This section applies to USAF installations that maintain a BASH program to prevent and reduce wildlife-related hazards to aircraft operations. This section **IS** applicable to Luke AFB, AUX-1, and Fort Tuthill.

### Program Overview/Current Management Practices

Bird and wildlife populations in the vicinity of the airfield pose a hazard to flying operations. Luke AFB lies within the Pacific flyway, which, at this location, is a minor flyway for waterfowl and a major flyway for raptors and small songbirds. While the area is a minor flyway for waterfowl, there is a small number of waterfowl surrounding Luke AFB due to the presence of irrigation canals. Bird strike concerns at Luke AFB are greatest when aircraft fly at low altitudes during takeoff and landing. An assessment of bird strikes involving Luke AFB assigned aircraft indicates no exceptional hazard from any one particular bird species. Analysis of remains from bird strike incidents have shown that strikes typically involve horned larks, doves (*Zenaida* spp. and *Streptopelia decaocto*), meadowlarks (*Sturnella neglecta*), swallows, pigeons (*Columba livia*), American kestrels (*Falco sparverius*), turkey vultures (*Cathartes aura*), and red-tailed hawks. In general, bird strikes are not limited to a particular time of day and have occurred from early morning to late at night.

BASH reduction plans are developed for DoD military installations where elevated hazards exist and can be controlled and mitigated, as is the case for Luke AFB. In response to this hazard, the 56 FW has developed and implemented a BASH Reduction Plan for Luke AFB and AUX-1 as well as Gila Bend AFAP and BMGR East (56 FW 2013). This plan is designed to accomplish the objectives, as follows.

- Establish a Bird Hazard Working Group.
- Establish procedures to identify and communicate high-hazard situations to aircrews and supervisors to determine whether altering flying operations is required.
- Provide aircraft and airfield operating procedures designed to avoid high-hazard situations.
- Provide for dissemination of information to all assigned aircrews and transient aircrews on specific bird hazards and procedures for avoidance.
- Decrease the attractiveness of the airfield to birds by eliminating, controlling, and reducing environmental factors that support birds and wildlife species.
- Establish an avian and wildlife harassment and depredation procedure for the Luke AFB airfield that will be implemented by qualified personnel and is designed to manage and eliminate potential BASH threats.
- Provide control and management guidelines for specific BASH threat species, including small birds, raptors, waterfowl, and small and large mammals.

In accordance with this plan, the USAF uses the Avian Hazard Advisory System (AHAS), which is a comprehensive method of remote sensing for birds. The AHAS system evaluates weather and radar data and provides real-time alerts to aviators when concentrations of large birds are in the airspace. The AHAS is available online and coverage includes the entire continental U.S. Additionally, as part

of the prevention program, AHAS provides pilots and flight schedulers with a near real-time tool when selecting flight routes.

Environmental management guidelines, as identified in the BASH Reduction Plan for Luke AFB, include controlling vegetation (e.g., maintaining vegetation height between 7 and 14 inches, removing dead vegetation and perches), controlling water (e.g., modifying ditches, eliminating standing water), controlling waste (e.g., collecting and disposing of waste rapidly), and controlling birds through chemical and physical alterations (e.g., installing bird proof structures, controlling insects and rodents). Priority BASH management actions under this plan include vigilant threat monitoring and reporting, management of the environment at the Luke AFB airfield, carrion removal around the airfield to reduce the abundance of large avian scavengers (e.g., turkey vultures), and bird/wildlife harassment and depredation, as required. A private contractor from the APHIS Wildlife Services Division currently conducts daily threat monitoring and performs all required airfield environmental management at the Luke AFB airfield. The contractor is also conducting all avian/wildlife relocation services in coordination with state and federal agencies, as well as all BASH harassment and depredation activities. The contractor issues BASH status reports on a monthly basis and provides annual and semi-annual BASH reports that summarize and analyze all monthly data. Bird harassment and depredation at Luke AFB is authorized by the USFWS through a permit issued annually to the 56 FW, which applies to both Luke AFB and Gila Bend Air Force Air Field (USFWS 2017).

## 7.13 Coastal Zone and Marine Resources Management

### Applicability Statement

This section applies to USAF installations that are located along coasts and/or within coastal management zones. This section **IS NOT** applicable to Luke AFB, AUX-1, or Fort Tuthill.

### Program Overview/Current Management Practices

Luke AFB, Fort Tuthill, and AUX-1 do not encompass any coastal or marine areas. The installation lies approximately 160 miles north of the Gulf of California, Mexico, the nearest coastal area to the installation.

## 7.14 Cultural Resources Protection

### Applicability Statement

This section applies to USAF installations with archaeological and structural cultural resources. This **IS** applicable to Luke AFB, AUX-1, and Fort Tuthill.

### Program Overview/Current Management Practices

Federal statutes, regulations, guidance documents, and EOs constitute the legal basis of USAF compliance responsibilities for managing cultural resources. The USAF will identify, manage, and

maintain important cultural resources in a spirit of stewardship for the benefit of current and future Americans (in accordance with AFI 32-7065) (USAF 2016b).

There are currently no listed or listing-eligible archaeological resources at Luke AFB, AUX-1, or Fort Tuthill. To date, no historical landscape surveys have been conducted at Luke AFB, and there are no known landscapes within the base boundaries that are associated with Native American culture.

A single Cold War-era structure, the Semi-Automatic Ground Environment Direction Center, or “Blockhouse” (Building 1150), has been deemed of national importance. No World War II-era structures are worthy of preservation, and aside from the blockhouse, none of the Cold War properties at Luke AFB qualify for listing on the National Register of Historic Places. As resources turn 50 years of age, they should be re-evaluated under standard criteria for the National Register of Historic Places.



Figure 7.2: Archaeologists excavate land before the development of the solar array at Luke AFB. Photo courtesy of Senior Airmen Sandra Welch.

Extensive subsurface archaeological features were discovered during the mitigation of the surface archaeological site in the footprint of the solar array, west of the Munitions Storage Area. There are several other archaeological sites located south of Super Sabre Street that have the potential for the same subsurface features. Therefore, no facilities should be sited south of Super Sabre Street (IDP 2017).

## 7.15 Public Outreach

The Public Affairs office at Luke AFB has several missions, including internal information, community relations, and media operations. Information is available to the public either through the news section on the Luke AFB website or through the Luke Thunderbolt newspaper. The public affairs office also coordinates with media to provide a civilian media outlet on activities within Luke AFB.

In the past, public participation programs have included posting project information on the Arizona Department of Commerce website ([www.azcommerce.com](http://www.azcommerce.com)); distributing project information to a mailing list of over 450 community organizations, agencies, and individuals; encouraging local media coverage of Military Compatibility Project achievements and events through distribution of press releases; and distributing documents in hard copy web, email, and data disc formats.

## 7.16 Geographic Information Systems (GIS)

### Applicability Statement

This section applies to all USAF installations that maintain an INRMP, as all geospatial information must be maintained within the USAF GeoBase system. Luke AFB, Fort Tuthill, and AUX-1 **ARE** required to implement this element.

### Program Overview/Current Management Practices

Air Force Instruction (AFI) 32-10112 (USAF 2007), *Installation Geospatial Information and Services*, provides the policy and guidance for GIS management on all USAF installations, including Luke AFB, AUX-1, and Fort Tuthill. Geospatial data at Luke AFB, including AUX-1 and Fort Tuthill, are maintained and managed by the 56 CES with the GIS server residing in the 56th Communication Squadron Network Communication Center and on the NIPRNet. All Luke AFB geospatial data are maintained within the USAF GeoBase System and services are provided through the GIS database that is centrally located on the server. The Luke AFB GIS program currently utilizes software from the Environmental Systems Research Institute (ESRI) for GIS data management. The 56 CES adhere to the Spatial Data Standards for Facilities, Infrastructure, and Environment, as required by the DoD, to provide GIS standardization for table structure, metadata, and data storage among all DoD installations.

Staff from the 56 CES utilize the GIS in its daily operations, as the data support the natural resource program at Luke AFB, AUX-1, and Fort Tuthill. Plans for updating Geospatial data periodically and adding GIS data acquisitions over the next five years include, but are not limited to those listed below.

- Further refining and delineating important wildlife habitats and corridors
- Monitoring and managing habitat disturbance and restoration efforts
- Monitoring and tracking invasive species and control effort results
- Analyzing projects for National Environmental Policy Act (NEPA) compliance and storing data for regulatory reporting
- Identifying and monitoring cultural resource sites, if any.

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## CHAPTER 8 MANAGEMENT GOALS AND OBJECTIVES

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The following are the overarching goals for the natural resources program, which reflect the values and desired future natural resource conditions. In this INRMP, the established goals remain valid for a five-year review cycle (2018–2023). Both the policy and resource-specific management goals have base-wide application. The overarching policy goals are non-resource-specific and are in support of and consistent with the military mission and protection and conservation of natural and cultural resources at Luke AFB, AUX-1, and Fort Tuthill. Objectives for specific resource areas, addressed in the respective chapters of this INRMP, are listed below.

- Protect and enhance environmental quality.
- Manage, conserve, develop, and maintain all resources in the best national interest, compatible with military operations and in accordance with the principles of multiple use and sustained yield.
- Design management activities based on an ecosystems management approach to benefit the total environment. Use of one resource should not exclude the use of another, except in the case of endangered or threatened species.
- Provide the greatest net public benefit for the greatest period of time, based upon analysis of prevailing ecological factors, the supply and demand of the various resources, and their uses. In determining the greatest net public benefit, full consideration will be given to both tangible and intangible values, including recreational, aesthetic, social, and commercial.
- Conduct all management activities to minimize the BASH potential. The primary BASH reduction measures will involve reducing bird attractants and implementing harassment and hazing techniques. Depredation will be used as a last option (per USFWS 2017). As much as possible, activities that could potentially affect the breeding success of birds should occur in early spring, before most birds reproduce.
- Utilize and care for resources in a combination best serving the present and future needs of the U.S. and its people.

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## CHAPTER 9 INRMP IMPLEMENTATION, UPDATE, AND REVISION PROCESS

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### 9.1 Natural Resources Management Staffing and Implementation

The Sikes Act encourages the DoD to provide adequate staffing with the appropriate expertise for updating, writing, and implementing the INRMP within the scope of DoD component responsibilities, mission, and funding requirements.

The 56 CES provides technically sound combat engineers to build, sustain, and protect Luke AFB through engineering and emergency response services. The 56 CES is organized into 6 flights consisting of 350 personnel and includes the Fire and Emergency Services Flight, Explosive Ordnance Disposal Flight, Readiness and Emergency Management Flight, Installation Management Flight, Operations Flight, and Engineering Flight. The 56 CES supports military training by managing the natural and cultural resources of the base in accordance with applicable laws, executive orders, and directives.

In August 2015, a cooperative agreement was signed between the USACE Omaha District and the AGFD to “collect, analyze, and apply environmental and cultural resource data and implement land rehabilitation and maintenance for optimal management of lands under control of the DoD” (USACE and AGFD 2015). The cooperative agreement provides Luke AFB assistance for executing prescribed tasks to implement the goals and objectives of the INRMP.

### 9.2 Monitoring INRMP Implementation

The USAF tracks its progress in implementing the updated INRMP during each subsequent five-year period. The AGFD and USFWS also each track their own progress using appropriate metrics. Common elements to be reported include funded/unfunded projects; coordination and feedback from cooperating agencies and military trainers; time frames for project implementation; deliverables for complying with biological opinions; and attainment of project-specific objectives. The effectiveness of management guided by the INRMP also will be gauged annually by tracking the degree to which each project implemented provides progress toward attaining the resource management goals established for the INRMP. The INRMP resource management goals are presented in Chapter 8, *Management Goals and Objectives*, and current implementation projects and the resource management goal(s) addressed by each project are identified in Chapter 10, *Annual Work Plans*.

### 9.3 Annual INRMP Review and Update Requirements

In accordance with DoDI 4715.03 and AFI 32-7064, INRMPs require annual review to ensure that projects and activities for the upcoming year have been identified and included in the INRMP and that all significant changes to the installation's mission requirements or its natural resources have been identified. The reviews also ensure or verify that all required coordination has occurred; required trained natural resource positions are filled or are in the process of being filled; all “must

fund” projects and activities have been budgeted for; project implementation is on schedule; current information on all conservation metrics is available; any necessary new management requirements are developed; and mission goals are achieved. This process involves installation natural resources personnel and external agencies cooperating to review the INRMP during regularly scheduled annual review meetings.

### **9.3.1 INRMP Update and Revision Process**

This is the 2018 update of the Luke AFB INRMP. It was prepared in support of an ongoing process required by the Sikes Act to monitor and improve INRMP effectiveness and to update or revise the INRMP at least every five years. If an installation's mission or any of its natural resource management issues do not change significantly enough to alter or increase environmental consequences identified in the previous INRMP, then the five-year review generally results in an INRMP update. If, however, there are to be INRMP changes that will result in significant new or altered environmental impacts, then a major INRMP revision is required.

The need for a major revision is normally determined during the annual review with the USFWS and the AGFD. The NRM/POC documents the annual review findings in an Annual INRMP Review Summary and obtains signatures from the coordinating agencies on review findings. During the annual review meetings, the NRM/Installation Support Section updates the external stakeholders/parties with the year-end execution report and coordinates future work plans and any necessary changes to management methods and other activities affecting natural resources. All parties review the INRMP and begin preliminary collaborative work on updating the INRMP (new policies, procedures, impacts, mitigations, etc.) as applicable.

A major INRMP revision requires approval by all parties involved and, if warranted, preparation of a new or supplemental NEPA analysis. For this current INRMP update, no changes have been identified that warrant the preparation of a NEPA document. The updated or revised INRMP is made available to the public, state and local governments, and Native American tribes on the Luke AFB website.

## CHAPTER 10 ANNUAL WORK PLAN

For the 2018–2023 5-year planning period, the USAF has prioritized and funded five surveys to be conducted by AGFD to update species and habitat information (Table 10.1). The flora and fauna information reported in this INRMP was collected during surveys in the 1990s. Monitoring and survey results will be incorporated into this INRMP during the annual reviews as results become available.

Table 10.1: USAF 2018–2023 5-year action plan for Luke AFB, AUX-1, and Fort Tuthill, including year of funding, frequency of action, and partner likely to be involved.

2018 INRMP Resource Management Actions 2018–2023				
Action	Fiscal Year <sup>1</sup>	Funding <sup>2</sup>	Frequency <sup>3</sup>	Partner <sup>4</sup>
Bird species and migratory bird species survey	FY 2018	\$50,000	One time	AGFD
Species, species at risk, and candidate/concern species survey	FY 2018	\$50,000	One time	AGFD
Habitat and vegetation classification survey	FY 2018	\$50,000	One time	AGFD
Habitat and invasive species survey	FY 2019	\$60,000	One time	AGFD
Habitat and invasive species survey	FY 2020	\$60,000	One time	AGFD

<sup>1</sup> Year of funding and completion of action.

<sup>2</sup> Estimate of required funding amount to complete project.

<sup>3</sup> How often action will occur.

<sup>4</sup> Parties responsible for completing the action; AGDF=Arizona Game and Fish Department.

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# MARINE CORPS AIR STATION YUMA

## INSTALLATION OVERVIEW

**August 2018**



**Prepared for:**  
**U.S. Department of the Navy,**  
**U.S. Marine Corps, Marine Corps Air Station Yuma**



**Prepared by:**  
**Colorado State University**  
**Center for Environmental Management of Military Lands**

**U. S. Marine Corps Installation Overview**  
**Marine Corps Air Station Yuma**  
**(MCAS YUMA)**  
**Arizona**



### ***About This Plan***

The Sikes Act Improvement Act (16 U.S. Code § 670a et seq.) authorizes the Secretary of the Navy to determine which installations require an Integrated Natural Resources Management Plan (INRMP). If the Secretary determines that a given installation has no significant natural resources and determines that preparing such a plan is inappropriate, then a determination can be made that an INRMP is not needed for that installation. Adequate reasons to justify not preparing an INRMP could result from negative findings from a biological assessment or the specific nature of an installation (e.g., fully developed).

Marine Corps Air Station (MCAS) Yuma is a fully developed installation that lacks significant natural resources, including any natural habitat that would require active wildlife management. MCAS Yuma implements separate plans, policies, and agreements that cover all components of land management that occurs on MCAS Yuma, including

- Agricultural Outleasing lease agreements;
- Bird/Aircraft Strike Hazard Reduction Plan (Marine Corps Air Station Yuma [MCAS Yuma] Station Order 3750.1C 2014);
- Environmental Management System Policy (MCAS Yuma 2017); and
- Integrated Pest Management Plan (MCAS Yuma 2016).

This installation overview was created in place of an INRMP to provide interested parties with a summary of what programs and management activities occur on the installation.

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## ACRONYMS

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<b>ADA</b>	Arizona Department of Agriculture
<b>AGFD</b>	Arizona Game and Fish Department
<b>AHAS</b>	Avian Hazard Advisory System
<b>AZ</b>	Arizona
<b>BASH</b>	Bird/Wildlife or Bird/Animal Aircraft Strike Hazard
<b>BMGR</b>	Barry M. Goldwater Range
<b>BSTRC</b>	Bob Stump Training Range Complex
<b>CLC-16</b>	Combat Logistics Company 16
<b>CMAGR</b>	Chocolate Mountain Aerial Gunnery Range
<b>Col.</b>	Colonel
<b>DoD</b>	U.S. Department of Defense
<b>DoN</b>	U.S. Department of the Navy
<b>EMS</b>	Environmental Management System
<b>EO</b>	Executive Order
<b>I&amp;L</b>	Installation and Logistics
<b>INRMP</b>	Integrated Natural Resources Management Plan
<b>IPMP</b>	Integrated Pest Management Plan
<b>MACS-1</b>	Marine Air Control Squadron 1
<b>MAG-13</b>	Marine Aircraft Group 13
<b>MAGTF</b>	Marine Air Ground Task Force
<b>MAWTS-1</b>	Marine Aviation Weapons and Tactics Squadron 1
<b>MBTA</b>	Migratory Bird Treaty Act
<b>MCAS</b>	Marine Corps Air Station
<b>MCCRTG-10</b>	Marine Corps Crew Readiness Training Group 10
<b>MCO</b>	Marine Corps Order
<b>NAF</b>	Naval Air Facility
<b>NAVFAC</b>	Naval Facilities Engineering Command
<b>NOPRS</b>	Naval Facilities Engineering Command Online Pesticide Reporting System
<b>POC</b>	Point of Contact
<b>RMD</b>	Range Management Department
<b>U.S.</b>	United States
<b>USFWS</b>	United States Fish and Wildlife Service
<b>USMC</b>	United States Marine Corps
<b>VMA-211</b>	Marine Attack Squadron 211
<b>VMFT-401</b>	Marine Fighter Training Squadron 401
<b>VMU-1</b>	Marine Unmanned Aerial Vehicle Squadron 1
<b>VMX-1</b>	Marine Operational Test and Evaluation Squadron 1
<b>VMX-22</b>	Marine Operational Test and Evaluation Squadron 22

## CHAPTER 1 OVERVIEW AND MISSION

### 1.1 Installation Overview

The U.S. Marine Corps Air Station Yuma (MCAS Yuma), located in Yuma, Arizona (AZ), occupies 4,486 acres of land (Table 1.1, Figure 1.1). MCAS Yuma is currently home to approximately 5,000 active-duty Marines and Sailors and approximately 9,500 dependents and civilian employees. MCAS Yuma includes Headquarters and Headquarters Squadron that is responsible for the day-to-day operations of the Air Station, keeping it functioning as a small community within the City of Yuma. A variety of departments, including Air Traffic Control, Installation and Logistics (I&L), Environmental, Range Management Department (RMD), Communications, Combat Camera, Provost Marshall, Legal Service Support, Safety, Fire, Facilities Management, Search and Rescue, Comptroller, and Billeting, make up the support services needed to keep the Air Station operational. In addition, MCAS Yuma is home to a number of tenant units, including Marine Aviation Weapons and Tactics Squadron 1 (MAWTS-1), Marine Operational Test and Evaluation Squadron 1 (VMX-1), Marine Aircraft Group 13 (MAG-13), Marine Air Control Squadron 1 (MACS-1), Marine Fighter Training Squadron 401 (VMFT-401), and Combat Logistics Company 16 (CLC-16).

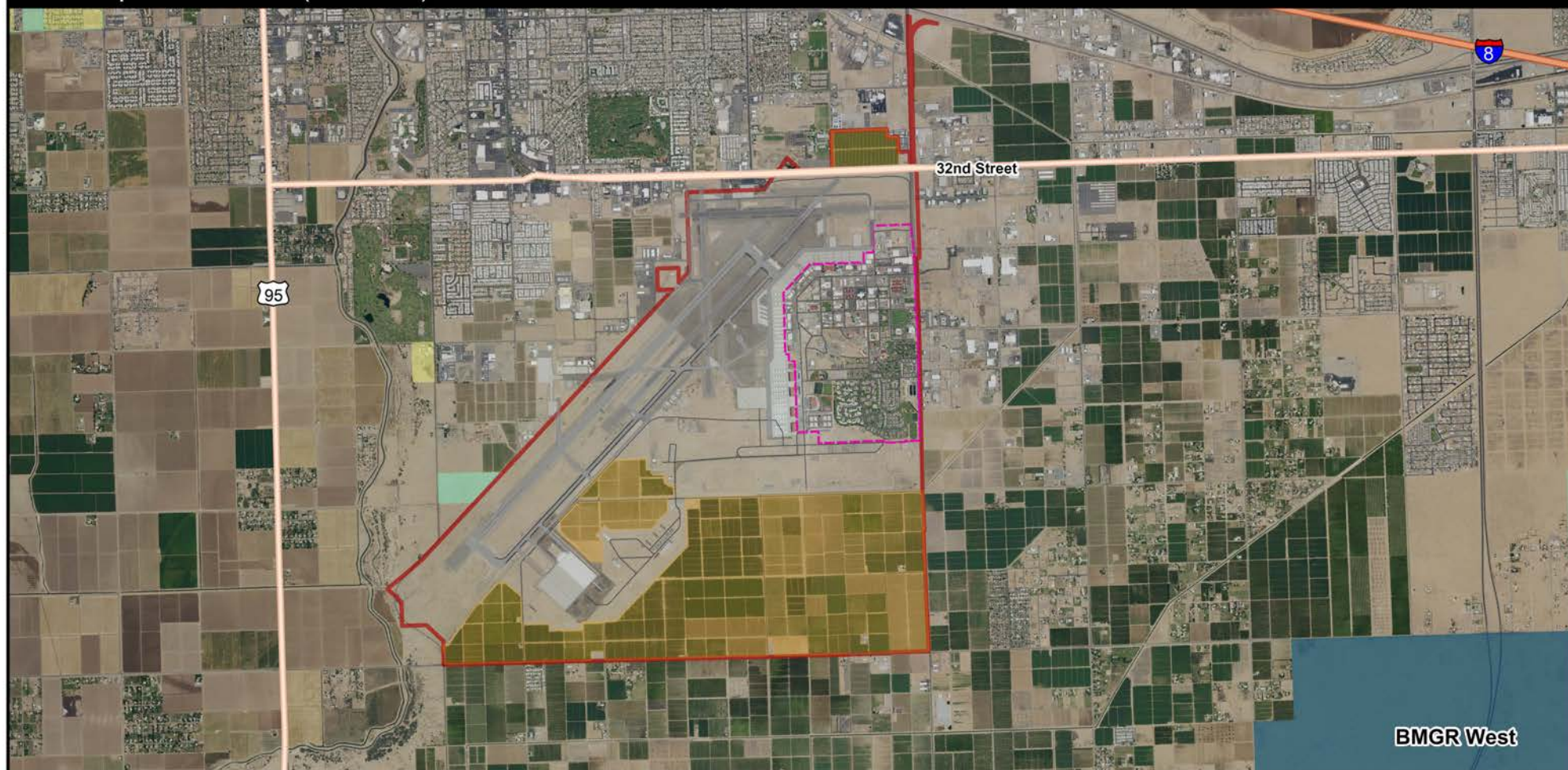
Table 1.1: Installation profile.

<b>Office of Primary Responsibility</b>	The Range Management Department at Marine Corps Air Station Yuma has the overall responsibility for implementing the Natural Resources Management Program and serves as the lead organization for monitoring compliance with applicable federal, state, and local regulations.
<b>Natural Resources Manager/Point of Contact</b>	Conservation Manager Range Management Department Conservation Section P.O. Box 99134/Building 151 MCAS Yuma, AZ 85369-9134 928-269-3401
<b>Total Acreage Managed by Installation</b>	MCAS Yuma—3,025 acres Agricultural Lease Area—1,461 acres Total MCAS Yuma—4,486 acres
<b>Natural Resource Programs</b>	<ul style="list-style-type: none"> <li>• Integrated Pest Management</li> <li>• Agricultural Outleasing Program</li> <li>• Bird/Wildlife Aircraft Strike Hazard (BASH) Program</li> </ul>

Figure 1.1: MCAS Yuma Installation Overview

## U.S. Marine Corps Air Station Yuma (MCAS Yuma) Installation Overview

Marine Corps Air Station Yuma (MCAS Yuma)



## Legend

- City/Town
- Main Roads
- Interstates
- Highways
- MCAS Yuma Agricultural Lease Area
- MCAS Yuma Airfield Area
- MCAS Yuma Cantonment Area
- MCAS Yuma Installation Boundary
- BMGR
- BLM
- State Trust Land
- Yuma Proving Ground
- Chocolate Mountain Aerial Gunnery Range
- Naval Air Facility El Centro



World Geodetic System 1984  
(WGS84) Projection  
Zone 11 N  
GCS\_WGS\_1984

Base data from ESRI StreetMap  
NAIP Imagery from FSA

Created By:  
Center for  
Environmental  
Management  
MILITARY LANDS  
Colorado State University

0 1 2 Miles



Through an agreement between the U.S. Marine Corps (USMC) and Yuma County, MCAS Yuma provides all air traffic control, airfield rescue and firefighting services, airfield security, and maintains the runways and taxiways for both MCAS Yuma and the Yuma International Airport. MCAS Yuma is the only shared-use air station in the USMC.

With access to more than one million acres of bombing and aviation-training ranges within the Bob Stump Training Range Complex (BSTRC), MCAS Yuma supports 80 percent of the USMC air-to-ground aviation training. The BSTRC includes the Barry M. Goldwater Range (BMGR), the Chocolate Mountain Aerial Gunnery Range (CMAGR), the U.S. Army Yuma Proving Ground, and the Naval Air Facility (NAF) El Centro ranges (Figure 1.1). MCAS Yuma is the custodian for the BMGR West and the CMAGR only, but it also provides scheduling services for the NAF El Centro's airspace areas. Annually, the air station hosts approximately 70 aviation units with an average of 600 aircraft and 14,000 personnel receiving ongoing training place throughout the year.

Additionally, there are more than 85,000 cubic nautical miles of special use airspace used for military operations beyond the airspace above MCAS Yuma and BMGR, including adjacent Federal lands and other parts of Arizona. Chapter 1, Section 1000.2 Scope in Station Order 3710.6J provides a comprehensive list of MCAS special use areas, including those outside the installation's command, in which MCAS Yuma personnel may operate and/or for which they schedule activities [USMC 2013b]]. Station Order 3710.6J specifies the MBTA among the policies and acts with which MCAS Yuma complies to "...preserve natural and cultural history, indigenous and endangered plants and wildlife...."

## 1.2 MCAS Yuma Installation History

The MCAS Yuma installation history summary that follows was acquired from the MCAS Yuma website (MCAS Yuma 2018).

It was 1928 when Col. Benjamin F. Fly fulfilled his namesake and persuaded the federal government to lease 640 acres of cactus, brush and desert wildlife from Yuma County. For the low price of \$1 per year, the government leased Fly Field for 20 years with an option for an additional 20 years.

Aviation was in its infancy and Fly Field became the center of attention in Yuma. During the summer of 1928, it was a stopover point for 25 planes in a New York to Los Angeles air race, a popular spectacle of the rapidly advancing world of aviation. It was used sporadically by private aircraft until 1941, when the U.S. government, through the Civil Aeronautics Administration, authorized an expenditure for permanent runways.

When the United States entered World War II, engineers erected an air base with the astounding speed that characterized the war effort. By early 1943, Yuma Army Air Base began graduating classes of pilots. The base became one of the busiest flying schools in the nation, training pilots of AT-6 single-engine trainers, T-17 multiengine trainers and B-17 Flying Fortresses.

At the end of the war, all flight activity here ceased and the area was partially reclaimed by the desert. During the period of inactivity, it was controlled successively by the War Assets Administration, the U.S. Corps of Engineers and the Department of the Interior's Bureau of Land Reclamation, which used it as a headquarters for its irrigation projects.

On July 7, 1951, the Air Force reactivated the base and the 4750th Air Base Squadron resumed training as part of the Western Air Defense Forces. The airfield was renamed Vincent Air Force Base in 1956 in memory of Brig. Gen. Clinton D. Vincent, a pioneer of bombing techniques who died in 1955.

### **From Air Force Base to Marine Corps Air Station**

The Department of the Navy signed for control of the base on January 1, 1959, and nine days later, Col. L.K. Davis became the first commanding officer of the newly designated Marine Corps Auxiliary Air Station. On July 20, 1962, the designation was changed to Marine Corps Air Station.



Figure 1.2: Yuma Army Airfield 1943.

From 1969 until 1987, the air station served primarily as a training base for pilots assigned to Marine Corps Crew Readiness Training Group 10, flying the F-4 Phantom, A-4 Skyhawk and AV-8A Harrier. In 1978, Marine Aviation Weapons and Tactics Squadron 1 was commissioned to assist in increasing combat readiness of fleet aviation units, making Yuma an academic center of excellence for military aviation.

In 1987, Marine Aircraft Group 13, with Marine Attack Squadrons 211, 214, 311 and 513, replaced MCCRTG-10 as the major tenant command on the station. The move also brought Marine Wing Support Squadron 371 to Yuma, joining Marine Air Control Squadron 7 and 2nd Light Anti-Aircraft Missile Battalion.

Throughout the fall of 1990, virtually every Marine Corps fixed-wing squadron that participated in Operations Desert Shield and Desert Storm underwent pre-deployment training on Yuma's ranges.

In November 2012, Marine Fighter Attack Squadron 121 (VMFA-121) became the world's first operational F-35 squadron at MCAS Yuma. The arrival of the F-35B marked the beginning of a new chapter in Marine Corps aviation history, bringing the latest and greatest aircraft in the world to the tip of America's expeditionary spear.

The summer of 2015 saw the arrival of Marine Operational and Evaluation Squadron 22 (VMX-22) to MCAS Yuma for the purpose of providing integrated operational testing. VMX-22 was later renamed to VMX-1. As an operation test and evaluation squadron, VMX-22 is primarily responsible for conducting operational tests in support of newly developed aircraft and programs.

Marine Unmanned Aerial Vehicle Squadron 1 (VMU-1) found a new home at MCAS Yuma in January 2016 and Marine Attack Squadron 211 (VMA-211) has begun their transition from the AV-8B Harrier to the F-35, continuing Yuma's tradition of leading the way in making aviation technology history every day.

### 1.3 Military Missions

The primary mission at MCAS Yuma is to “Provide aviation ranges, support facilities, and services that enable its tenants, other USMC commands, visiting military, and interagency forces to enhance their mission capability and combat readiness.”

MCAS Yuma is the Marine Corps' premier aviation training base. With access to approximately 1 million acres of bombing and aviation training ranges and superb flying weather, MCAS Yuma supports 80 percent of the Corps' air-to-ground aviation training. Each year, the air station hosts numerous units and aircraft from U.S. and North Atlantic Treaty Organization forces.

The ideal weather and location along the Colorado River make Yuma and the surrounding area an oasis in the southwestern Sonoran Desert with a bounty of superb recreational opportunities and water sports. Seasonal hunting and fishing abound in the fish- and game-rich Yuma area.

Nestled in five square miles just southeast of Yuma, the air station is home to a number of tenant units including MAWTS-1, VMX-1, MAG-13, MACS-1, VMFT-401, VMU-1, VMA-211, and Combat Logistics Company 16 (CLC-16).



Figure 1.3: U.S. Marine Corps F-35B at MCAS Yuma.

### 1.4 Management Philosophy

MCAS Yuma is committed to practicing a policy of active environmental management on the ranges, training areas, and support facilities under the management of the installation. A primary goal is to incorporate environmental stewardship into day-to-day operations to maintain environmental integrity without compromising the military mission. This approach is consistent with U.S. Department of Defense (DoD) and USMC environmental management policy (MCAS Yuma 2013), which states as follows.

*The USMC is committed to mission accomplishment and to environmental protection. Minimizing adverse environmental impacts helps the Marine Corps to be a good steward, win hearts and minds, and sustain its combat capability into the future. The Marine Corps is committed to protecting the health and integrity of the environment, both at home and abroad, complying with the Nation's laws, conserving our natural resources and national treasures, preventing pollution through best management practices consistent with mission requirements, and consistent with mission objectives. The Marine Corps shall continue to refine environmental management programs, proactively mitigate environmental and health risks, and ensure*

*individuals are appropriately trained and empowered to provide stewardship of the lands to which the Marine Corps is entrusted.*

Based on this, MCAS Yuma has developed and implemented an Environmental Management System (EMS) Policy (MCAS Yuma 2017). This approach seeks to balance the goals of maximizing land use for the military mission readiness while also maintaining the environment. The focus of the EMS program is to develop, promote, and refine a comprehensive, ecosystem-based management program for resource conservation. This ecosystem-based approach is intended to facilitate maximum support of the USMC military training mission and infrastructure while simultaneously promoting the sustainability of native species and habitats and maintaining compliance with applicable laws and regulations.

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## CHAPTER 2 PHYSICAL ENVIRONMENT

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### 2.1 Climate

The climate of MCAS Yuma represents one of the driest and hottest in the U.S. It is characterized by warm-to-hot temperatures in spring, summer, and early fall. The average high temperature in July at MCAS Yuma is 107 degrees Fahrenheit. Mean temperatures in spring and fall are 87 (April) and 90 degrees Fahrenheit (October). Winter temperatures tend to be mild. December is the coolest month of the year with an average daily high temperature of 69 degrees Fahrenheit. Daily minimum temperatures range from 81 (July) to 46 degrees Fahrenheit (January) (Western Regional Climate Center 2018).

Precipitation at MCAS Yuma occurs almost entirely in the form of rain. The occurrence of snow, sleet, and hail are rare events that typically generate just trace amounts of precipitation. Winter rains occur primarily in December and January with monthly averages of 0.38 and 0.42 inches, respectively. August is normally the wettest month of the year at MCAS Yuma with an average of 0.47 inches of rain. Winter rains result from weather fronts that begin in the Pacific Ocean and move east across Arizona. These precipitation events are generally widespread and characterized by gentle rainfall. Summer rains result from moisture moving into Arizona from Mexico, the Gulf of Mexico, and/or the Gulf of California. Summer rains or monsoons tend to be highly localized and result in brief, torrential downpours often accompanied by high winds and lightning. Drought conditions are common in the Yuma area. The weather station at MCAS Yuma normally receives about 2.99 inches of precipitation annually, but extended periods of drought have been recorded (Western Regional Climate Center 2018).

### 2.2 Landforms and Geology

MCAS Yuma lies within a large drainage bowl with higher topographic features along the boundary of the installation. The interior portions of MCAS Yuma is very flat and nearly void of topography. Near the center of the installation, there are a few hills that rise approximately 90 feet above the rest of the base and are the highest points in the area. To the southwest where the installation boundary ends, a terrace drops down approximately 50 feet towards the Colorado River floodplain.

MCAS Yuma lies within the southern sections of the Salton Trough of the Basin and Range province of the Sonoran Desert region. The Sonoran Desert to the east of Yuma consists of elongated, low, rugged mountains, mostly trending north-northwest with large patches of desert plain in between. The Salton Trough is a low-lying extension of the Gulf of California with relatively low relief throughout. The Salton Sea to the northwest of MCAS Yuma has an elevation of -230 feet. The basin and surrounding mountains were structurally formed by a major fault line associated with the San Andreas system (Olmsted et al. 1973). The faults nearest to base are the Basement Saddle Fault, which traverses the southwestern portion of MCAS Yuma, and the Yuma Hills fault, which generally lies along the installation's eastern boundary

The most prominent mountains in the Yuma area are the Gila Mountains located in the western portion of the BMGR. These mountains trend north-northwest and are approximately 27 miles long. The elevation profile of the MCAS Yuma area ranges from 100 to 250 feet above sea level, which contrasts with the very rugged Gila Mountains to the east, where local relief exceeds 2,000 feet and can be as high as 3,150 feet. The Gila Mountains' principle geologic materials are Tertiary, nonmarine, sedimentary rocks, and pre-Tertiary crystalline granites, gneiss, and schist (Olmsted et al. 1973). Other small mountain ranges and "hills" that occur sporadically in the basin range area around MCAS Yuma are primarily composed of pre-Tertiary crystalline rock types.

Soils at MCAS Yuma are primarily alluvial-based sand, silt, and clay deposits (McAuliffe 2018). Calcium carbonate deposits are common throughout the area. A majority of the saline deposits at the installation have been removed due to past land-use disturbances. The most prominent geologic features in the surrounding Yuma area are dune complexes and arid plains with sparse vegetation and extensive desert pavements.

## 2.3 Hydrology

Principal rivers in the region include the Colorado and Gila rivers. In the immediate region, the Colorado River flows from north to south across a broad floodplain surrounded by intensively used agricultural lands. The Gila River, a principle tributary to the Colorado River, confluent with the Colorado along the western edge of Yuma, just west of MCAS Yuma. Most streams and rivers in the region are intermittent in nature due, in part, to the hyper-arid climate and extensive irrigation withdrawals.

The MCAS Yuma installation does not have any ponds, streams, wetlands, or major drainage channels. Soils at the installation exhibit rapid permeability rates, leading to little or no natural surface drainage during precipitation events. This, coupled with the fact that MCAS Yuma lies within a drainage bowl, means most surface flow is retained on the installation property. Groundwater in the MCAS Yuma area occurs at approximately 85 to 140 feet below grade. Irrigation water for the MCAS Yuma agricultural lease areas is supplied from the Colorado River through a series of canals and ditches.

## 2.4 Ecosystems and the Biotic Environment

Ecoregions denote areas of general similarity in ecosystems and the type, quality, and quantity of environmental resources. Ecoregions are identified through the spatial patterns and composition of biotic and abiotic phenomena, including geology, physiography, vegetation, climate, soils, land use, wildlife, and hydrology. A hierarchical scheme using Roman numerals has been adopted for identifying different levels of ecological regions, with Level I being the coarsest and Level IV the most detailed. MCAS Yuma lies within the Sonoran Basin and Range Level III ecoregion and along the boundary between the Central Sonoran/Colorado Desert Basin and Lower Colorado/Lower Gila River Valleys Level IV ecoregions (Griffith et al. 2014).

MCAS Yuma is situated in the Lower Colorado River Valley Subdivision of the Sonoran Desert (Brown and Lowe 1980). The Lower Colorado River Valley Subdivision is the largest and most arid subdivision of the Sonoran Desert (Turner and Brown 1982). This subdivision is dominated by broad, intermountain plains of alluvial soils. Vegetation is generally open and simple, often with many hundreds of square miles dominated by one or two species of low-growing shrubs. The ground surface between shrubs may be composed of fine-textured soil or desert pavements consisting of gravel or rock. Plants are drought-resistant with sclerophyllous adaptations to retard transpiration. Creosote bush (*Larrea tridentata*) is the dominant plant species at most localities, typically forming monotonous, uniform growth on the flat intermountain plains occasionally broken by paloverde (*Parkinsonia* spp.) and mesquite (*Prosopis* spp.) along the washes.

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## CHAPTER 3 NATURAL RESOURCES PROGRAM MANAGEMENT

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### 3.1 Fish and Wildlife Management

MCAS Yuma is largely developed with little available natural habitat on the installation. Because of this, very little active wildlife management occurs on the installation. Wildlife species present at MCAS Yuma are characteristic of the Lower Colorado River Valley Subdivision of the Sonoran Desert (Turner and Brown 1982) and urban-adapted species common to this area of southern Arizona. Small, nocturnal, burrowing species of Heteromyid rodents (e.g., pocket mice (*Chaetodipus* spp.) and kangaroo rats (*Dipodomys* spp.); bats; and diurnal, burrowing species (e.g., round-tailed ground squirrel [*Xerospemophilus tereticaudus*]) are likely the most common species in areas that retain some element of natural habitat characteristics. Bats are unlikely to occur in large numbers over the highly urbanized and landscaped areas of the installation, although they may be present over the leased agricultural areas. Other mammals likely to occur at MCAS Yuma include the black-tailed jackrabbit (*Lepus californicus*), desert cottontail (*Sylvilagus audubonii*), and coyote (*Canis latrans*). Some species, particularly the desert cottontail and coyote, are highly adapted to urbanized settings and may use landscaped areas within the installation.

The base's housing areas support a variety of large trees, shrubs, and herbaceous flowering plants that provide some foraging and roosting habitat for resident and Neotropical migratory birds. Current conditions should be maintained by replacing or replanting trees and shrubs lost to disease or storms. In addition, the agricultural lease areas, particularly the citrus groves, likely provide habitat for a variety of bird species. While providing habitat is important to the EMS mission, increased avian species in these areas may lead to increased Bird/Wildlife Aircraft Strike Hazard (BASH) concerns.

Western burrowing owls (*Athene cunicularia*) are infrequently observed at MCAS Yuma and precautions have been taken in the past to limit impacts to this species. In one such instance, several burrowing owls were observed roosting near bunkers that were set to be demolished. MCAS Yuma natural resource staff had these owls safely relocated off-site through the help of an Arizona-based raptor rescue organization.

Reptiles likely to occur at MCAS Yuma include common, widespread species such as side-blotched lizard (*Uta stansburiana*), western whiptail lizard (*Aspidoscelis tigris*), and the gopher snake (*Pituophis catenifer*). Reptiles are most likely to occur within the undeveloped portions of the installation, although they may frequent developed areas as well.

### 3.2 Threatened and Endangered Species and Species of Concern

There are no federally listed plant or animal species that regularly inhabit MCAS Yuma, although rare occurrences of vagrant individuals are possible. Species protected by the Migratory Bird Treaty Act (MBTA) and species listed by the Arizona Game and Fish Department (AGFD) as Species of Greatest Conservation Need (SGCN) may occur at MCAS Yuma. These species are discouraged from occupying the MCAS Yuma airfield to minimize the risk of BASH issues and the risk of mortality to SGCN species.

The SGCN list identifies species of concern to the AGFD because their occurrence in Arizona is, or may be in jeopardy. A species is listed on the basis of the degree to which its habitats or populations have been impacted and its probability of extirpation from Arizona. Known threats and documented population decline are now more important factors than a limited distribution.

Many native plant species are afforded protection by the Arizona Department of Agriculture (ADA) under the Arizona Native Plant Law and are categorized as highly safeguarded, salvage restricted, export restricted, salvage assessed, and/or harvest restricted (Arizona Department of Agriculture 1994). Species with ADA protection that occur at MCAS Yuma include mesquite, paloverde, ocotillo (*Fouquieria splendens*), and all species of cacti present on the installation. No populations of federally listed plants are known to occur at MCAS Yuma.

### 3.3 Agricultural Outleasing

Approximately 1,461 acres of the MCAS Yuma installation area is leased for agricultural production (Figure 1.1). This area is broken into separate individual parcels that each have their own contract and lease agreement. Leases typically include a base period with potential subsequent options not to exceed a total of 10 years in length. All contracts are awarded through competition. A network of open concrete-lined canals, ditches, and gated pipe provides surface water from the Colorado River to irrigate the agricultural area. On average, each acre is allocated approximately 9-acre feet of water per year. Alfalfa (*Medicago sativa*) is the primary crop grown in the leased area, although both citrus (*Citrus* spp.) and cotton (*Gossypium* spp.) are also common. Small grain crops are typically not allowed due to BASH concerns and many of the citrus groves are being phased out due to both BASH concerns and disease (mistletoe [*Phoradendron* spp.]) issues.

All lessees must follow the stipulations outlined in the USMC Environmental Compliance and Protection Manual (USMC 2013a). Additionally, lessees must submit an annual Pest Management Plan outlining their expected use of pesticides and herbicides. The lessees are required to routinely report actual chemical usage via the Naval Facilities Engineering Command Online Pesticide Reporting System (NOPRS). Lease proceeds are used to pay for costs associated with the administration of the agricultural outlease program and to support other MCAS Yuma natural resources projects.

### 3.4 Integrated Pest Management Program

Executive Order (EO) 13751 (EO 13751 2016) requires federal agencies to identify actions that may affect invasive species; use relevant programs to prevent introduction of invasive species; detect, respond to, and control such species; monitor invasive species populations; provide for restoration of native species; conduct research on invasive species; and promote public education. An invasive species, as defined in EO 13751, is a “non-native organism whose introduction causes or is likely to cause economic or environmental harm, or harm to human, animal, or plant health.” In order to comply with EO 13751, MCAS Yuma has implemented an Integrated Pest Management program that uses a comprehensive approach to weed and pest control. This approach takes into account the

various chemical-, physical-, and biological-suppression techniques available and analyzes the invasive species' habitat and interspecies relationships within the ecosystem.

The MCAS Yuma Integrated Pest Management program is guided by the MCAS Yuma Integrated Pest Management Plan (IPMP) (MCAS Yuma 2016). This IPMP provides a comprehensive overview of pest management and pesticide-related operations on the installation and can be used as a reference by all installation personnel and external pesticide regulators. Specifically, the MCAS Yuma IPMP provides or identifies

- mission-related pest management objectives;
- administrative and operational requirements for the application of pesticides by DoD and commercial contract personnel on the Base;
- personnel and departmental responsibilities for the program;
- pests of medical, economic, and agricultural importance and surveillance and control procedures for each;
- pesticides approved for use on the installation through the web-based NOPRS;
- administrative oversight on pest management operations conducted under contract;
- pest management practices and aspects that may significantly impact human health and the environment and ensures compliance with state and federal regulations;
- facilities and resources for pest management;
- coordination with other activity programs, such as environmental and facilities management, with cross-reference to existing environmental management plans;
- a plan to minimize human and environmental exposure to pesticides; and
- a plan of action to control harmful pests in the event of a natural disaster or vector-borne disease outbreak.

Pest and weed management records are retained within the Integrated Pest Management Information System program. These records include management actions covering in-house, contractor, and subcontractor applications. Adherence to the MCAS Yuma IPMP will ensure compliance with all applicable DoD, USMC, Navy, federal, State of Arizona, and State of California laws and regulations that follow.

- EO 13751 (2016)
- EO 11987 (1977)
- DoD Instruction 4150.07, with change 1 (DoD 2017a)
- DoD Directive 4715.1E (DoD 2005)
- DoD Instruction 4715.03, with CH 1 (DoD 2017b)
- Marine Corps Order (MCO) P5090.2A (USMC 2013a)
- Office of the Chief of Naval Operations (OPNAV) Instruction 6250.4C (U.S. Department of the Navy [DoN] 2012)
- OPNAV Instruction 5090.1B (DoN 2003)
- Federal Insecticide, Fungicide, and Rodenticide Act of 1996 (7 U.S. Code § 136 et seq. 1996)

DoD Instruction 4150.07, with CH1, provides policies and procedures to establish and maintain safe, effective, and environmentally sound integrated pest management programs to prevent or control pests and disease vectors that may adversely impact readiness or military operations by affecting the health of personnel or damage structures, material, or property. It also ensures that pest management programs achieve, maintain, and monitor compliance with all applicable EOs and applicable federal, state, and local statutory and regulatory requirements. The pest management programs incorporate sustainable philosophy, strategies, and techniques in all aspects of the DoD and component vector control and pest management planning, training, and operations, including installation pest management plans and other written guidance to reduce pesticide use.

### **Protection of the Public**

Precautions are taken during pesticide application to protect the personnel at MCAS Yuma. Signs are used to indicate areas of where pesticides have been applied. These signs are left displayed until the re-entry intervals listed on chemical labels have passed. Whenever pesticides are applied outdoors, care is taken to ensure any spray drift is kept away from individuals, including the applicator and non-targeted areas. As a rule, pesticides are not applied outdoors when wind speeds exceed 10 miles per hour. At no time are personnel permitted into a treatment area during pesticide application unless they have met the medical monitoring standards and are wearing proper personal protective equipment. Sensitive areas, such as medical facilities and child care centers, require extra precautions on where and how pesticides are applied around these locations.

### **Pesticide Spills and Remediation**

The MCAS Yuma Spill Prevention, Countermeasure, and Control Plan includes a site-specific pesticide spill response plan for Building 880 Pest Control Facility and a general response protocol for any area a pesticide spill may occur on installation.

### **Animal Pests**

The presence of feral animals, particularly feral cats, is a concern to the MCAS Yuma RMD because they are common in the developed portions of MCAS Yuma and can have a substantial negative impact on wildlife species, including migratory birds. The DoD urges pet owners to keep all cats indoors for the cats' safety and to prevent them from killing federally protected wildlife species on federal lands. A feral cat killing a protected species would be a violation of the DoD's Memorandum of Understanding with the USFWS (U.S. Department of Defense and U.S. Fish and Wildlife Service 2006), which requires installations to protect bird species covered under the MBTA. Feral animals are handled either by local animal control or Provost Marshalls Office animal control. Rock pigeons (*Columba livia*), which are not protected by the MBTA, are controlled by the pest control technicians associated with MCAS Yuma. Management actions to control them may include removal and altering the suitability of their habitats, in accordance with applicable permits from the U.S. Fish and Wildlife Service (USFWS) and the AGFD.

### **Insect Pests**

Common insect pests at MCAS Yuma include bees, wasps, and hornets, which are occasionally removed from the installation with management options that include spot treatment and nest

removal. Other insect pests include subterranean termites. Termite inspections are performed as needed and, when an active termite infestation is found, the area is spot treated by a pest-control specialist.

### 3.5 Bird/Wildlife Aircraft Strike Hazard (BASH)

Bird and wildlife populations pose a hazard to safe flying operations in the vicinity of the airfield (Table 3.1). MCAS Yuma lies within the Pacific flyway, which, at this location, is a minor flyway for waterfowl and a major flyway for raptors and songbirds. Although the area is a minor flyway for waterfowl, the presence of irrigation canals and golf course ponds surrounding MCAS Yuma attract a small number of waterfowl. Bird-strike concerns at MCAS Yuma are greatest when aircraft fly at low altitude during takeoff and landing. An assessment of bird strikes involving MCAS Yuma-assigned aircraft indicates no exceptional hazard from any one particular bird species. Analyses of remains from bird-strike incidents have shown that strikes typically involve swallows, doves, and a variety of raptor species. In general, bird strikes are not limited to a particular time of day and have occurred from early morning to late at night. There is typically an increase in bird strikes at MCAS Yuma during the biannual Weapons and Tactics Instructor course, which occurs in April and October each year.

BASH reduction plans are developed for DoD military installations where elevated hazards exist and can be controlled and mitigated, which is the case at MCAS Yuma. In response to this hazard, MCAS Yuma has developed and implemented a BASH Reduction Plan for the air station (MCAS Yuma Station Order 3750.1C). This plan was created to minimize aircraft exposure to potentially hazardous bird/animal strikes while performing critical training and readiness missions. The plan reduces this bird/animal strike potential through awareness, avoidance, monitoring, and actively controlling bird/animal populations and movements. Specifically, this plan is designed to

- establish a BASH Working Group;
- establish procedures to identify and communicate high-level hazard situations to aircrews and supervisors to determine whether altering flying operations are required;
- provide aircraft and airfield operating procedures designed to avoid high-level hazard situations;
- provide for dissemination of information to all assigned aircrews and transient aircrews on specific bird hazards and procedures for avoidance;
- decrease the attractiveness of the airfield to birds by eliminating, controlling, and reducing environmental factors that support birds and wildlife species;
- establish an avian and wildlife harassment and depredation procedure designed to manage and eliminate potential BASH threats at the MCAS Yuma airfield to be implemented by qualified personnel; and
- provide control and management guidelines for specific BASH threat species, including small birds, raptors, waterfowl, and small and large mammals.

Table 3.1: MCAS Yuma BASH strike summary from 2012 to 2017.

<b>MCAS Yuma Bird/Wildlife Air Strike Hazard Strike Summary (2012–2017)</b>			
<b>Year</b>	<b>BASH Strikes Per Year</b>	<b>Remains Collected Per Year</b>	<b>Species Identified</b>
2012	1	0	Unknown species
2013	5	2	Brewer's sparrow ( <i>Spizella breweri</i> ), red-tailed hawk ( <i>Buteo jamaicensis</i> ), and multiple unknown species
2014	1	1	Burrowing owl
2015	5	5	White-winged dove ( <i>Zenaida asiatica</i> ), tree swallow ( <i>Tachycineta bicolor</i> ), multiple unknown species
2016	8	5	Eared grebe ( <i>Podiceps nigricollis</i> ) and multiple unknown species
2017	8	5	Tree swallow, western kingbird ( <i>Tyrannus verticalis</i> ), barn swallow ( <i>Hirundo rustica</i> ), and multiple unknown species

The MCAS Yuma BASH Working Group governs the BASH program at MCAS Yuma. The working group meets quarterly to assess the status of the BASH Reduction Program and provides recommendations and guidance for improving the program delivery. These meetings are held in conjunction with the Commanding Officer's Safety Council meetings and are coordinated by the MCAS Yuma Installation Aviation Safety Officer. The MCAS Yuma BASH Working Group includes the personnel as follows.

- Commanding Officer (Chairperson)
- Airfield Operations Officer
- Air Traffic Control Facility Officer
- Range Director
- Aviation Safety Officer
- Natural Resources Specialist
- Pest Management Officer
- Tenant Unit Representatives including:
  - Marine Aircraft Group 13
  - Marine Aviation Weapons and Tactics Squadron 1
  - Marine Fighter Training Squadron 401

The MCAS Yuma BASH Reduction Plan outlines the BASH management requirements and coordination procedures for all BASH Working Group personnel and staff. The Range Management Conservation Manager maintains all required federal and state permits (Depredation, Special Purpose-Relocate) to successfully manage BASH operations. The Range Management Conservation Manager also maintains all harassment and depredation equipment, retains all BASH records, and

ensures that personnel are properly trained and available for all required BASH management actions. The RMD monitors migratory, seasonal, and local bird activities and sends all remains from BASH strike incidents to the Smithsonian Institute for official review, identification, and cataloging.

MCAS Yuma uses the Avian Hazard Advisory System (AHAS), a comprehensive method of remote sensing for tracking birds. The AHAS system evaluates weather and radar data and provides real-time alerts to aviators when concentrations of large birds are in the airspace. The AHAS is available online and its coverage includes the entire continental U.S. Additionally, as part of the prevention program, AHAS provides pilots and flight schedules with a near real-time tool when selecting flight routes. Other environmental management guidelines, as identified in the BASH Reduction Plan for MCAS Yuma, include controlling vegetation (e.g., maintaining vegetation height, removing dead vegetation and perches), controlling water (e.g., modifying ditches, eliminating standing water), controlling waste (e.g., collecting and disposing of waste rapidly), and controlling birds through chemical and physical alterations (e.g., installing bird-proof structures, controlling insects and rodents). Priority BASH management actions under this plan include vigilant threat monitoring and reporting, management of the environment at the MCAS Yuma airfield, carrion removal around the airfield to reduce the abundance of large avian scavengers (e.g., turkey vultures [*Cathartes aura*]), and bird/wildlife harassment and depredation, as required.

### 3.6 Public Outreach

The Office of Communication at MCAS Yuma has several missions that include providing internal information, community relations, and media operations. Information is available to the public either through the news section on the MCAS Yuma website ([www.mcas-yuma.marines.mil](http://www.mcas-yuma.marines.mil)) or through the MCAS Yuma Facebook page. The Office of Communication also coordinates with local media to provide a civilian media outlet on activities within MCAS Yuma.

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# **EXHIBIT 7**

\*GO 2019-36

GENERAL ORDERS }

NO. 2019-36 }

HEADQUARTERS  
DEPARTMENT OF THE ARMY  
WASHINGTON, DC, 8 October 2019

### ASSIGNMENT OF SOUTHWEST BORDER SITES

1. Effective 8 October 2019, upon transfer of administrative jurisdiction to the Department of the Army, the Southwest Border sites as designated by the Secretary of Defense for the border barrier military construction projects pursuant to Title 10, United States Code, Section 2808 are assigned to U.S. Army Garrison Fort Bliss, Texas (Installation Code 48125). Exercise of all necessary authority, direction, and command and control over the Southwest Border sites assigned to Fort Bliss will be in accordance with Army Regulation 600-20.
2. U.S. Army Materiel Command is designated the Real Property Accountable Organization for the Southwest Border sites and shall promptly register the sites, as they are acquired, in the Army Accountable Property System of Record as required by Department of Defense Instruction 4165.14.

[DAMO-FMI]

  
Ryan D. McCarthy  
Secretary of the Army

DISTRIBUTION: This publication is available in electronic media only and is intended for the Regular Army, the Army National Guard/Army National Guard of the United States, and the U.S. Army Reserve.

# **EXHIBIT 8**



U.S. GOVERNMENT ACCOUNTABILITY OFFICE

441 G St. N.W.  
Washington, DC 20548

B-330862

September 5, 2019

Congressional Requesters

Subject: *Department of Defense—Availability of Appropriations for Border Fence Construction*

This responds to your request for our legal opinion on whether the Department of Defense (DOD) may transfer and use its fiscal year 2019 appropriations for the purpose of constructing fences at the southern border of the United States.<sup>1</sup> Specifically, you asked (1) whether DOD's transfer of amounts to its Drug Interdiction and Counter-Drug Activities, Defense, account for border fence construction was consistent with DOD's transfer authority; (2) whether DOD's use of its Drug Interdiction and Counter-Drug Activities, Defense, account for border fence construction was consistent with appropriations law principles in light of amounts previously appropriated to DOD's Operation and Maintenance, Defense-Wide, account for installing fences; and (3) whether DOD's reliance on the Department of Homeland Security (DHS) to exercise its authority to waive certain laws requiring environmental studies to facilitate DOD border fence construction was consistent with a certain prohibition on the use of DOD's fiscal year 2019 appropriations.

As discussed below, we conclude that DOD's transfer of amounts into its Drug Interdiction and Counter-Drug Activities, Defense, account for border fence construction was consistent with DOD's statutorily enacted transfer authority, and that use of these amounts for the purpose of border fence construction was permissible under various statutory provisions. We also conclude that DHS waivers of legal requirements did not violate a prohibition on use of DOD's appropriations. Our opinion applies the legal provisions to the facts before us and does not address or draw conclusions regarding border fencing as a policy matter.

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<sup>1</sup> Letter from Patrick Leahy, Vice Chairman, Committee on Appropriations, United States Senate; Richard J. Durbin, Vice Chairman, Subcommittee on Defense, Committee on Appropriations, United States Senate; and Brian Schatz, Ranking Member, Subcommittee on Military Construction, Veterans Affairs, and Related Agencies, Committee on Appropriations, United States Senate, to the Comptroller General (March 11, 2019).

Consistent with our practice for legal opinions, we requested and received from DOD pertinent factual information and its legal views on this matter. GAO, *Procedures and Practices for Legal Decisions and Opinions*, GAO-06-1064SP (Washington, D.C.: Sept. 2006), available at [www.gao.gov/products/GAO-06-1064SP](http://www.gao.gov/products/GAO-06-1064SP); Letter from Managing Associate General Counsel, GAO, to General Counsel, DOD (June 10, 2019); Letter from Deputy General Counsel, Fiscal, DOD, to Managing Associate General Counsel, GAO (July 3, 2019) (Response Letter).<sup>2</sup>

## BACKGROUND

### Statutory authority for border fence construction

DHS has statutory authority to control and guard the borders of the United States. 8 U.S.C. § 1103(a)(5). Specifically, the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), as amended, requires DHS to take necessary actions to install physical barriers and roads in the vicinity of the border of the United States to deter illegal crossings in areas of high illegal entry. Pub. L. No. 104-208, div. C, title I, § 102(a), 110 Stat. 3009, 3009-546, 3009-554 (Sept. 30, 1996), as amended by Department of Homeland Security Appropriations Act, 2008, Pub. L. No. 110-161, div. E, title V, § 564, 121 Stat. 1844, 2042, 2090 (Dec. 26, 2007). The REAL ID Act of 2005 amended IIRIRA by expanding the authority of the Secretary of DHS to waive all legal requirements determined necessary to ensure expeditious construction of barriers and roads along the border. Pub. L. No. 109-13, div. B, title I, § 102, 119 Stat. 231, 302, 306 (May 11, 2005).

DHS has delegated authority to secure the borders to the Customs and Border Protection's (CBP) Border Patrol. 6 U.S.C. § 211(e)(3). Border Patrol divides responsibility for border security geographically among nine sectors along the southern border as follows: San Diego; El Centro; Yuma; Tucson; El Paso; Big Bend; Del Rio; Laredo; and Rio Grande Valley. GAO, *CBP Is Evaluating Designs and Locations for Border Barriers But Is Proceeding Without Key Information*, GAO-18-614 (Washington, D.C.: July 2018), at 8. CBP receives an annual appropriation for its construction activities, among other purposes, in its Procurement, Construction, and Improvements account. See, e.g., Department of Homeland

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<sup>2</sup> Of the three questions addressed herein, one of the questions—that is, whether DOD's transfer of amounts to its Drug Interdiction and Counter-Drug Activities, Defense, account for border fence construction was consistent with DOD's transfer authority—is the subject of ongoing litigation in federal courts. See, e.g., *Donald J. Trump, et al. v. Sierra Club, et al.*, 588 U.S. \_\_\_\_ (2019) (granting application to stay a permanent injunction ordered by the District Court). In response to our request to DOD for factual information and its legal views on the three questions asked of the Comptroller General, DOD stated that the government's pleadings in *Sierra Club* reflect DOD's legal views, and provided us with copies of the government's pleadings, administrative records, and declarations filed in *Sierra Club*.

Security Appropriations Act, 2019, Pub. L. No. 116-6, div. A, title II, 133 Stat. 13, 15, 18 (Feb. 15, 2019).

DOD has statutory authority to provide support to civilian law enforcement agencies, such as DHS. See subtitle A, part I, chapter 15 of title 10 of the United States Code (Military Support for Civilian Law Enforcement Agencies). For example, DOD may train federal civilian law enforcement officials and make military equipment available to them. 10 U.S.C. §§ 272, 273.

DOD also has authority under section 284 of title 10 of the United States Code (section 284) to provide support for the counter-drug activities of another department of the federal government if that support is requested by the official who has responsibility for the counter-drug activities. 10 U.S.C. § 284(a)(1)(A). One of the “purposes for which [DOD] may provide support” includes “[c]onstruction of . . . fences . . . to block drug smuggling corridors across international boundaries of the United States.” 10 U.S.C. § 284(b)(7).

DOD receives an annual appropriation for its counter-drug activities in its Drug Interdiction and Counter-Drug Activities, Defense, account. See, e.g., Department of Defense Appropriations Act, 2019, Pub. L. No. 115-245, div. A, title VI, 132 Stat. 2981, 2982, 2997 (Sept. 28, 2018). In fiscal years 2006 and 2008, DOD received line-item appropriations in its Operation and Maintenance, Defense-Wide, account for support to DHS, including “installing fences.” Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Hurricane Recovery, 2006, Pub. L. No. 109-234, title V, 120 Stat. 418, 480 (June 15, 2006); Department of Defense Appropriations Act, 2008, Pub. L. No. 110-116, div. A, title II, 121 Stat. 1295, 1299 (Nov. 13, 2007).

#### Executive Order, Appropriations for Fiscal Year 2019, and National Emergency

On January 25, 2017, the President ordered executive departments and agencies “to deploy all lawful means to secure the Nation’s southern border.” Exec. Order No. 13767, *Border Security and Immigration Enforcement Improvements*, 82 Fed. Reg. 8793 (Jan. 25, 2017). The President also declared it the policy of the executive branch to secure the southern border through “immediate construction of a physical wall,” and defined “wall” as “a contiguous, physical wall or other similarly secure, contiguous, and impassable physical barrier.” *Id.* at 8793–8794.

Consistent with the executive order, the President’s Budget for Fiscal Year 2019, transmitted in February 2018, requested \$1.8 billion in appropriations for CBP Procurement, Construction, and Improvements, with \$1.6 billion of that budgeted for border security assets and infrastructure. *Appendix, Budget of the United States Government for Fiscal Year 2019*, (Feb. 2018), at 496–497, available at <https://www.whitehouse.gov/wp-content/uploads/2018/02/appendix-fy2019.pdf> (last visited Aug. 5, 2019). On January 6, 2019, the Office of Management and Budget notified members of the House and Senate Appropriations Committees that the

President was requesting a total of \$5.7 billion in fiscal year 2019 amounts for CBP to construct a steel barrier for the southwest border. See, e.g., Letter from Acting Director, Office of Management and Budget, to the Chairman of the Committee on Appropriations, United States Senate (Jan. 6, 2019) (OMB Letter), at 1. CBP was ultimately appropriated \$2.5 billion for Procurement, Construction, and Improvements. Pub. L. No. 116-6, 133 Stat. at 18. Of the total amount available for CBP Procurement, Construction, and Improvements, \$1.375 billion was “for the construction of primary pedestrian fencing, including levee pedestrian fencing, in the Rio Grande Valley Sector.” *Id.* § 230(a)(1).

With respect to DOD activities, the President’s Budget did not specifically request anything for construction of fences at the border, but requested \$787.5 million for Drug Interdiction and Counter-Drug Activities, Defense. *Appendix, Budget for Fiscal Year 2019*, at 236. In September 2018, Congress appropriated to DOD for fiscal year 2019 \$881.5 million for Drug Interdiction and Counter-Drug Activities, Defense. Pub. L. No. 115-245, 132 Stat. at 2997. In the same appropriations act, Congress in section 8005 granted DOD authority to transfer up to \$4 billion between its appropriations, on the condition that “. . . such authority to transfer may not be used unless for higher priority items, based on unforeseen military requirements, than those for which originally appropriated and in no case where the item . . . has been denied by the Congress . . . .” *Id.* § 8005 (section 8005).

After appropriations were enacted, on February 15, 2019 the President officially declared that a national emergency exists at the southern border of the United States. Proclamation No. 9844, *Declaring a National Emergency Concerning the Southern Border of the United States*, 84 Fed. Reg. 4949 (Feb. 15, 2019). A fact sheet published by the White House announced plans for DOD to provide support to DHS by constructing fences to block drug smuggling corridors pursuant to DOD’s authority under section 284.<sup>3</sup> White House, Fact Sheets: *The Funds Available to Address the National Emergency at Our Border* (Feb. 26, 2019), available at <https://www.whitehouse.gov/briefings-statements/funds-available-address-national-emergency-border/> (last visited Aug. 5, 2019). To fund DOD’s efforts, the announcement stated that DOD would transfer up to \$2.5 billion to DOD’s Drug Interdiction and Counter-Drug Activities, Defense, account from other DOD accounts using DOD’s transfer authority under section 8005. *Id.*

#### Fiscal Year 2019 activities with respect to DOD border fence construction

On February 25, 2019, DHS requested that DOD provide assistance to secure the southern border by, among other things, constructing fences to block drug-

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<sup>3</sup> As noted above, section 284 authorizes DOD to provide support for the counter-drug activities of another department including “[c]onstruction of . . . fences . . . to block drug smuggling corridors across international boundaries of the United States.” 10 U.S.C. § 284(b)(7).

smuggling corridors across the international boundary between the United States and Mexico pursuant to DOD's authority under section 284. Response Letter, Encl. 1. DHS requested DOD's assistance in four particular sectors: Yuma, El Paso, El Centro, and Tucson. *Id.*

DOD agreed to provide support to DHS, and in March and May transferred \$1.8 billion into its Drug Interdiction and Counter-Drug Activities, Defense, account using its authority under section 8005.<sup>4</sup> Response Letter, Encl. 1. DOD awarded contracts for border fence construction for locations in the Yuma, El Paso, El Centro, and Tucson sectors. See, e.g., DOD, *Contracts for April 9, 2019*, Release No. CR-066-19, available at <https://dod.defense.gov/News/Contracts/Contract-View/Article/1809986/> (last visited Aug. 5, 2019) (April Contracts); DOD, *Contracts for May 15, 2019*, Release No. CR-092-19, available at <https://dod.defense.gov/News/Contracts/Contract-View/Article/1848882/> (last visited Aug. 5, 2019) (May Contracts).

DHS published notices under IIRIRA, as amended, that it was installing physical barriers in the Yuma, El Paso, El Centro, and Tucson sectors, and that DOD was providing support by constructing fences, among other things, in those sectors. 84 Fed. Reg. 17185 (Apr. 24, 2019); 84 Fed. Reg. 17187 (Apr. 24, 2019); 84 Fed. Reg. 21798 (May 15, 2019); 84 Fed. Reg. 21800 (May 15, 2019). In the notices,

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<sup>4</sup> As noted above, section 8005 provides authority for DOD to transfer up to \$4 billion between appropriations on the condition that “. . . such authority to transfer may not be used unless for higher priority items, based on unforeseen military requirements, than those for which originally appropriated and in no case where the item . . . has been denied by the Congress . . .” Pub. L. No. 115-245, § 8005. On March 25, 2019, DOD transferred a total of \$1 billion using authority under section 8005 from the Military Personnel, Army, and Reserve Personnel, Army accounts, made available in the DOD Appropriations Act, 2019. Response Letter, Encl. 1. On May 9, 2019, DOD transferred a total of \$818.5 million using authority under section 8005 from the following accounts, made available in the DOD Appropriations Act, 2019: Reserve Personnel, Army; National Guard Personnel, Army; Military Personnel, Navy; Military Personnel, Marine Corps; Reserve Personnel, Navy; Military Personnel, Air Force; Reserve Personnel, Air Force; National Guard Personnel, Air Force; Aircraft Procurement, Air Force; Missile Procurement, Air Force; Space Procurement, Air Force; and Chemical Agent and Munitions Destruction, Defense. *Id.* DOD also transferred \$681.5 million on May 9, 2019 into its Drug Interdiction and Counter-Drug Activities, Defense, account to fund activities in support of DHS using authority under section 9002 of the DOD Appropriations Act, 2019. *Id.* That transfer authority is not the subject of our opinion. We are aware that DOD announced plans this week to use unobligated military construction funds for projects along the southern border. Letter from Secretary, DOD, to the Chairman of the Committee on Armed Services, House of Representatives (Sept. 3, 2019). Use of military construction funds is not the subject of this opinion either.

DHS also stated that it was waiving several laws in their entirety, including the National Environmental Policy Act (NEPA), to ensure expeditious construction of barriers in these sectors. Pub. L. No. 109-13, § 102; see, e.g., 84 Fed. Reg. at 17187.

## DISCUSSION

At issue here is whether DOD's transfer of amounts to its Drug Interdiction and Counter-Drug Activities, Defense, account for border fence construction was consistent with DOD's transfer authority under section 8005, and whether DOD's use of its Drug Interdiction and Counter-Drug Activities, Defense, account for the purpose of border fence construction was a permissible use of this appropriation account. We also address whether DHS's waivers of legal requirements in order to expedite border fence construction was consistent with a certain prohibition on the use of DOD's appropriations. We will address each of the three issues in turn.

### Transfer of DOD appropriations for border fence construction

Agencies may transfer<sup>5</sup> funds only when expressly authorized by law. 31 U.S.C. § 1532. In that regard, section 8005 authorizes DOD to transfer funds between appropriations as follows:

“Upon determination by the Secretary of Defense that such action is necessary in the national interest, he may . . . transfer not to exceed \$4,000,000,000 of . . . funds made available in this Act . . . between such appropriations or funds or any subdivision thereof, to be merged with and to be available for the same purposes, and for the same time period, as the appropriation or fund to which transferred: *Provided*, That such authority to transfer may not be used unless for higher priority items, based on unforeseen military requirements, than those for which originally appropriated and in no case where the item . . . has been denied by the Congress . . .” Pub. L. No. 115-245, § 8005.

In March and May of 2019, DOD transferred amounts made available in the DOD Appropriations Act, 2019, into its Drug Interdiction and Counter-Drug Activities, Defense, account in order to construct fences in four particular sectors at the southern border in support of DHS pursuant to DHS's request and DOD's authority under section 284.<sup>6</sup> Response Letter, Encl. 1. DOD relied on its authority under

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<sup>5</sup> A transfer is the shifting of budget authority between appropriations. GAO, *A Glossary of Terms Used in the Federal Budget Process*, GAO-05-734SP (Washington, D.C.: Sept. 2005), at 95.

<sup>6</sup> DOD referred to this as a “reprogramming action.” Response Letter, Encl. 1. DOD uses the phrase “reprogramming action” generally to include both transfers (the shifting of funds from one appropriation account to another) and reprogrammings (continued...)

section 8005 for these transfers. *Id.* The issue is whether DOD's transfers were consistent with DOD's transfer authority under section 8005. Specifically at issue here are two of the conditions under section 8005 that must be satisfied. First, the item to which funds are transferred must be of "higher priority . . . based on unforeseen military requirements, than those for which originally appropriated." Pub. L. No. 115-245, § 8005. Second, the item to which funds are transferred must not be one "denied by the Congress." *Id.* We consider each of these statutory conditions in turn.

(1) Higher priority based on unforeseen military requirements

DOD asserts that the transferred funds were in support of higher priority items, based on unforeseen military requirements. Response Letter, Encl. 1. The first issue is whether DOD border fence construction in support of DHS under section 284 was an unforeseen military requirement. The answer is determined by reference to section 284 and DOD's internal guidance.

DOD states that "unforeseen" under section 8005 means that DOD was not aware of the need at the time of the budget request and when Congress passed DOD's appropriations. Response Letter, Encl. 8. We do not disagree with DOD's interpretation of "unforeseen" under section 8005. For purposes of section 8005, the question is not whether border fencing was unforeseen in general. Indeed, the President campaigned for border fencing and explicitly requested amounts for border fencing as part of DHS's budget. *See, Donald Trump's Presidential Announcement Speech*, (June 16, 2015), available at <https://time.com/3923128/donald-trump-announcement-speech/> (last visited Aug. 28, 2019); OMB Letter, at 1. Rather, the question under section 8005 is whether it was unforeseen at the time of the budget request and enactment of appropriations that DOD would fund and construct border fencing pursuant to DOD's authority under section 284.

Section 284 makes clear that DOD's authority to construct fences in support of other departments is available only upon the request of another department and DOD's acceptance of the request. 10 U.S.C. § 284(a)(1)(A) (DOD "*may* provide support . . . if . . . requested" by the official with responsibility for the counter-drug activities) (emphasis added). Here, the President's Budget for Fiscal Year 2019 was submitted in February 2018, and while the President requested funds for border fencing as part of DHS's budget, DOD had not yet been requested by an appropriate official to provide support to DHS by constructing fences under section 284, and DOD's budget did not include amounts to provide support under section 284.

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(...continued)

(the shifting of funds within an account). *See* DOD Financial Management Regulation 7000.14-R, vol. 3, ch. 6, *Reprogramming of DOD Appropriated Funds* (Sept. 2015); *Glossary*, at 85, 95.

Similarly, when DOD received its appropriations for fiscal year 2019 through its annual appropriations act enacted on September 28, 2018, there was not yet a request from DHS or an acceptance by DOD regarding support at the southern border pursuant to section 284.

Rather, DOD's authority to support DHS by constructing fences at the southern border under section 284 only materialized when DHS requested DOD's assistance on February 25, 2019, and DOD accepted the request. (DOD accepted part of the work in March 2019 and the remainder of the work in May 2019). Response Letter, Encl. 1 (providing copies of DHS's February 25, 2019 request letter and DOD's March 2019 and May 2019 acceptance letters). Until the requisite request and acceptance for support took place, which was well into the second quarter of fiscal year 2019, DOD had no requirement to construct fences under section 284. Thus it was unforeseen at the time of DOD's budget request and appropriations that DOD would fund and construct such border fences.

DOD defines "military requirement" as "[a]n established need justifying the timely allocation of resources to achieve a capability to accomplish approved military objects, missions, or tasks." CJCS Guide 3401D, *CJCS Guide to the Chairman's Readiness System*, Appendix A, Glossary (Nov. 15, 2010, current as of Nov. 25, 2013). Once DOD accepted DHS's request, the provision of support constituted a military requirement as defined in DOD's internal guidance.

The legislative history of section 8005 indicates that one of the reasons Congress enacted this transfer authority was to provide DOD with flexibility when changing conditions occur. H.R. Rep. No. 93-662, at 16 (1973). While border fencing in general was foreseen, it was not foreseen that DOD would fund and construct border fencing pursuant to DOD's authority in section 284. The realization of a military requirement during the course of the fiscal year, as was the case here, is such a condition that the transfer authority permits DOD to address. DOD's authority to construct fences in support of civilian agencies is dependent upon a request from such agency under section 284. That authority, and a corresponding military requirement for construction, did not materialize until after submission of the President's Budget and enactment of DOD's appropriations and thus was not forecast in DOD's budget submission. We conclude that DOD's fence construction projects constitute an unforeseen military requirement under section 8005.

The next issue is whether construction of fences at the southern border in support of DHS constituted a "higher priority" military requirement than the activities from which funds were transferred. In light of the President's order to executive departments and agencies to "deploy all lawful means to secure the Nation's southern border . . . through the immediate construction of a physical wall,"<sup>7</sup> and declaration of national

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<sup>7</sup> 82 Fed. Reg. at 8793.

emergency at the southern border,<sup>8</sup> DOD asserts that the transferred funds were in support of higher priority military requirements. We are in no position to disagree with DOD's prioritization of military requirements. DOD asserts that funds were available from other accounts to transfer into its Drug Interdiction and Counter-Drug Activities, Defense, account for various reasons. Lower than expected agency contributions to the new Blended Retirement System due to fewer than planned opt-ins, a reduction to Army's overall end strength target, and reduced projected costs gained by shortening schedules at chemical agent destruction plants meant that some funds were no longer needed for these purposes and could be transferred into the Drug Interdiction and Counter-Drug Activities, Defense, account. Response Letter, Encl. 1. We do not find legally objectionable DOD's determination that construction of fences at the southern border in support of DHS was a higher priority than these activities from which funds were transferred.

Based on the foregoing, we conclude that DOD satisfied the first condition of section 8005 when it transferred funds into its Drug Interdiction and Counter-Drug Activities, Defense, account in order to construct fences at the southern border in support of DHS pursuant to DHS's request and DOD's authority under section 284. We now consider the second condition of section 8005.

(2) Not denied by Congress

DOD asserts that "none of the items [to which funds are being transferred] has previously been denied by the Congress." Response Letter, Encl. 1. The "items" here are fences at four sectors at the southern border, and we consider whether such fences were denied by Congress for fiscal year 2019.

Neither section 8005 nor the DOD Appropriations Act, 2019, defines "denied by Congress." So, we turn to the ordinary meaning of the term "deny" which is "to refuse to grant" or "to give a negative answer to." Merriam-Webster Dictionary Online, *Definition of deny*, available at [www.merriam-webster.com/dictionary/deny](http://www.merriam-webster.com/dictionary/deny) (last visited Aug. 5, 2019). GAO has recognized that when "Congress . . . intends to impose a legally binding restriction on an agency's use of funds, it does so by means of explicit statutory language." 55 Comp. Gen. 307, 318, Oct. 1, 1975. This principle, along with the ordinary definitions, suggest that to deny is to actively refuse.

Here, the President's Budget for Fiscal Year 2019 did not request any amounts for DOD with respect to construction of fences at the southern border, so there was nothing for Congress to deny with respect to DOD. Further, Congress did not include any restrictive language with regard to border fences in either the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (NDAA, 2019),

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<sup>8</sup> 84 Fed. Reg. at 4949.

Pub. L. No. 115-232, 132 Stat. 1636 (Aug. 13, 2018), or the DOD Appropriations Act, 2019, Pub. L. No. 115-245, 132 Stat. 2982.

The appropriation to CBP for \$1.375 billion for the construction of primary pedestrian fencing in the Rio Grande Valley sector does not constitute a “denial” of appropriations to DOD for its counter-drug activities in furtherance of DOD’s mission under section 284 to support other agencies’ activities. Additionally, although Congress ultimately appropriated less to CBP in its Procurement, Construction, and Improvements account than what the President requested, a reduction from the amount requested is not tantamount to a denial of the item by Congress, nor does a reduction from the amount requested negate the otherwise proper exercise of statutory transfer authority. DOD came to the same conclusion. Response Letter, Encl. 2.

We have reached similar conclusions in prior opinions. For example, where Congress did not appropriate amounts requested for fiscal year 1979 for the President’s new Urban Crime Prevention Program, the agency put the program into effect anyway by using amounts budgeted for other related programs. B-195269, Oct. 15, 1979. We did not take issue with the agency’s actions since the agency’s appropriations were otherwise available for this purpose. *Id.* The fact that Congress did not appropriate the additional amount for the program did not mean that Congress intended to curtail, or deny, the initiative, and Congress did not enact legislation imposing restrictions on the use of money for this purpose. See *id.* As another example, where Congress made \$8 million available for fiscal year 1963 for a certain National Aeronautics and Space Administration (NASA) activity, as opposed to the request for \$10 million, we did not object to NASA’s transfer of \$4.4 million to increase amounts for the activity, on the grounds that the reduction by Congress did not render inoperative the exercise of NASA’s statutory transfer authority. B-151157, June 27, 1963.

Here, there was no denial of fences at the southern border and, in fact, Congress provided affirmative authority for the same. Specifically, Congress provided DOD authority under section 284 to support the counter-drug activities of civilian law enforcement agencies (including the construction of fences), an appropriation for counter-drug activities, and authority to transfer amounts between its appropriations. 10 U.S.C. § 284; Pub. L. No. 115-245, 132 Stat. at 2997; Pub. L. No. 115-245, § 8005. Congress provided DHS with direction to install physical barriers at the border, a lump-sum appropriation for CBP’s construction activities, and a line-item<sup>9</sup> appropriation to be used for fencing in the Rio Grande Valley sector, one of the nine sectors at the southern border. Pub. L. No. 104-208, § 102(a), *as amended by* Pub.

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<sup>9</sup> A lump-sum appropriation is one that is made to cover a number of programs, projects, or items. In contrast, a line-item appropriation is available only for the specific object described. GAO, *Principles of Federal Appropriations Law*, Vol. 2, 3rd ed., ch. 6, § B.1, GAO-06-382SP (Washington, D.C.: Feb. 2006).

L. No. 110-161, § 564; Pub. L. No. 116-6, 133 Stat. at 18; Pub. L. No. 116-6, § 230(a)(1).

We do note that certain congressional committees expressed objection to the transfers and use of DOD amounts for this purpose. See Letter from Senate Committee on Appropriations, to the Acting Secretary of Defense (Mar. 25, 2019); Letter from House of Representatives Committee on Appropriations, to the Under Secretary of Defense, Comptroller (Mar. 26, 2019); Letter from House of Representatives Committee on Armed Services, to the Under Secretary of Defense Comptroller and Chief Financial Officer (Mar. 26, 2019). However, the Supreme Court has made clear that congressional exercise of legislative power requires bicameralism and presentment.<sup>10</sup>

Although prior committee approval is not binding as a matter of law, and the objection of the congressional committees in this case does not constitute a “denial by Congress” within the meaning of section 8005, we have cautioned that agencies “ignore such expressions of intent at the peril of strained relations with the Congress.” 55 Comp. Gen. 307, 325, Oct. 1, 1975. Indeed, the DOD Financial Management Regulation sets forth a process for DOD to obtain the prior approval of the Appropriations and Armed Services Committees of the House of Representatives and United States Senate prior to transferring amounts between appropriations under section 8005. DOD-FMR 7000.14-R, vol. 3, ch. 6. In this case, there is no evidence that DOD obtained prior approval of the committees before the March or May transfers.

Having found that DOD’s March and May transfers of funds into its Drug Interdiction and Counter-Drug Activities, Defense, account for border fence construction was consistent with the conditions under section 8005 for a higher priority item based on unforeseen military requirements, and not denied by Congress, we conclude that the transfers were a permissible use of DOD’s transfer authority. We now turn to consideration of whether the use of DOD appropriations for the purpose of border fence construction was permissible.

#### Use of DOD appropriations for border fence construction

The purpose statute, 31 U.S.C. § 1301(a), provides that “[a]ppropriations shall be applied only to the objects for which the appropriations were made . . . .” Given the size and breadth of the federal government, Congress may appropriate amounts for

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<sup>10</sup> See *Immigration & Naturalization Service v. Chadha*, 462 U.S. 919 (1983) (holding that a one-house veto provision is unconstitutional because it was an exercise of legislative power that circumvented the procedures of bicameralism and presentment); see also B-330330.1, Dec. 10, 2018; GAO, *Principles of Federal Appropriations Law*, 4th ed., 2016 rev., ch. 2, § B.7.a(4), GAO-16-464SP (Washington, D.C.: Mar. 2016).

a broad purpose and not enumerate each permissible expenditure. As such, application of the purpose statute requires an analysis of whether the expenditure in question is a “necessary expense” of the appropriation. This application involves a three-step analysis, known as the necessary expense rule: (1) the expenditure must bear a logical relationship to the appropriation; (2) the expenditure must not be prohibited by law; and (3) the expenditure must not be otherwise provided for. See, e.g., B-303170, Apr. 22, 2005; GAO, *Principles of Federal Appropriations Law*, 4th ed., 2017 rev., ch. 3, § B, GAO-17-787SP (Washington, D.C.: Mar. 2016). We address DOD’s use of its appropriations for the purpose of border fence construction in the context of this three-step analysis.

(1) Step 1: logical relationship between the expenditure and the appropriation

With regard to step one, the expenditure must contribute to accomplishing the purposes of the corresponding appropriation. In this regard, the language of the appropriation act is of paramount importance. See, e.g., B-303927, June 7, 2005. Other statutes, such as authorizing legislation, and the agency’s interpretation of its appropriations are also relevant considerations. B-323365, Aug. 6, 2014; B-223608, Dec. 19, 1988.

In this case, following DOD’s transfer of amounts into its Drug Interdiction and Counter-Drug Activities, Defense, appropriation, DOD obligated those amounts by awarding contracts for construction of fences in the Yuma, El Paso, El Centro, and Tucson sectors, in accordance with DHS’s request. Response Letter, Encl. 6, 7; April Contracts; May Contracts. The question is whether DOD border fence construction undertaken pursuant to section 284 contributes to accomplishing the purposes of the Drug Interdiction and Counter-Drug Activities, Defense, appropriation.

We begin with the language of the appropriation and the provision permitting DOD to support the counter-drug activities of other agencies (section 284). The Drug Interdiction and Counter-Drug Activities, Defense, appropriation provides that it is available for, among other things, “counter-narcotics support.” Pub. L. No. 115-245, 132 Stat. at 2997. Border fence construction with no connection to countering narcotics does not fall within the plain meaning of the appropriation. Here, DOD’s border fence construction was undertaken pursuant to section 284, which specifically authorizes “construction of . . . fences . . . to block drug smuggling corridors across international boundaries of the United States.” 10 U.S.C. § 284(b)(7).

Based on the information before us, the fence construction requested by DHS meets the conditions of section 284. In its request to DOD for support, DHS asserted that the Yuma, El Paso, El Centro, and Tucson sectors are experiencing “large numbers of individuals and narcotics being smuggled into the country illegally” and are used “as drug smuggling corridors.” Response Letter, Encl. 1. DHS also asserted that “[t]he construction of border infrastructure within the [p]roject [a]reas will support

DHS's ability to impede and deny illegal entry and drug smuggling activities within the [p]roject [a]reas." *Id.* Construction of fences in order to block drug smuggling corridors is logically related to hindering, or countering, the movement of narcotics. Thus, DOD's construction of fences in this case bears a logical relationship to the stated purpose of the Drug Interdiction and Counter-Drug Activities, Defense, appropriation, that is, for "counter-narcotics support."

Because border fence construction under the circumstances presented here has a logical relationship to the Drug Interdiction and Counter-Drug Activities, Defense, appropriation, we conclude that step one of the necessary expense rule is satisfied.

(2) Step 2: expenditure not prohibited by law

We now consider, under the second step of the necessary expense rule, whether there is a specific statutory prohibition on the use of appropriations for border fence construction undertaken pursuant to section 284. When a law specifies that an agency's appropriation is not available for a designated purpose, obligations or expenditures for that purpose may violate the Antideficiency Act, 31 U.S.C. § 1341(a)(1), which provides that an agency may not obligate or expend in excess or in advance of an appropriation. For example, where an expenditure violated the prohibition on publicity or propaganda of the relevant appropriations act, and the agency had no appropriations available for this purpose, the agency violated the Antideficiency Act. B-302710, May 19, 2004. Here, neither the NDAA, 2019, nor the DOD Appropriations Act, 2019, contains any prohibitive language regarding construction of fences at the southern border. We are not aware of any other law that prohibits use of DOD's appropriations for border fence construction. We conclude that step two of the necessary expense rule is satisfied.

(3) Step 3: expenditure not otherwise provided for

Having concluded that DOD's obligation of funds for construction of fences at the southern border bears a logical relationship to the Drug Interdiction and Counter-Drug Activities, Defense, appropriation and that use of DOD's appropriations for this purpose was not prohibited by law, we now turn to the final step: determining whether another appropriation other than the Drug Interdiction and Counter-Drug Activities, Defense, account provides for DOD border fence construction pursuant to section 284 in the Yuma, El Paso, El Centro, and Tucson sectors. If another appropriation provides for this activity, then use of the Drug Interdiction and Counter-Drug Activities, Defense, account for this activity would be impermissible under the purpose statute, 31 U.S.C. § 1301(a).

With regard to step three, a more specific appropriation prevails over a general appropriation, including where another agency has the more specific appropriation. *Compare* B-139510, May 13, 1959 (concluding that the Navy's Shipbuilding and Conversion, Navy, appropriation was not available to dredge a deeper channel for naval vessel transit because the Army Corps of Engineers had more specific

appropriations for this purpose) *with* B-184595, Mar. 10, 1976 (concluding that the Immigration and Naturalization Service's (a precursor to Border Patrol) appropriations could be used to repair border fencing installed by other agencies because there was no other appropriation more specific in this regard that prevailed).

Applying our case law to the issues here, we first consider whether DHS, the agency with statutory authority for controlling and guarding the borders, has an appropriation that specifically provides for the activity in question—border fence construction undertaken by DOD pursuant to section 284. DHS is required to install physical barriers at the border to deter illegal crossings in areas of high illegal entry. Pub. L. No. 104-208, § 102(a), *as amended by* Pub. L. No. 110-161, § 564. DHS was appropriated a lump-sum amount for CBP's Procurement, Construction, and Improvements, which, based on the information before us, is available to fund DHS's mandate to install physical barriers in the sectors located at the southern border. Pub. L. No. 116-6, 133 Stat. at 18. Of the lump sum, CBP was also appropriated a line-item amount available only for the construction of fencing in one particular sector—the Rio Grande Valley. *Id.* § 230(a)(1). Thus, DHS has amounts available for CBP's fence construction activities, including an amount available only for fencing in the Rio Grande Valley sector.

However, Congress has also long vested DOD with authority to construct fences as part of its counter-drug support activities upon the request of another agency, and has provided DOD with appropriations to cover this activity. Specifically, in the National Defense Authorization Act for Fiscal Year 1991, Congress permitted DOD to provide support for the counter-drug activities of other agencies, including construction of fences to block drug smuggling corridors, under what is now section 284. Pub. L. No. 101-510, div. A, title X, § 1004, 104 Stat. 1485, 1629-1630 (Nov. 5, 1990). DOD's provision of support for the counter-drug activities of other agencies is not subject to reimbursement under section 284. While section 277(a) of title 10 of the United States Code provides that DOD shall require a law enforcement agency to which support is provided to reimburse DOD for that support, section 284(g)(1) provides that support provided under section 284 is not subject to other requirements of the chapter, which would include section 277(a). Congress established the Drug Interdiction, Defense (now the Drug Interdiction and Counter-Drug Activities, Defense), appropriation in the DOD Appropriations Act, 1989, to cover DOD's costs under section 284. See Pub. L. No. 100-463, title VII, 102 Stat. 2270, 2270-16 (Oct. 1, 1988).

The fact that Congress appropriated line items in fiscal years 2006 and 2008 for "installing fences" has no legal consequence at this point in time. Specifically, Congress in 2006 appropriated \$708 million as an additional amount for DOD Operation and Maintenance, Defense-Wide, for emergency support to DHS, including "installing fences and vehicle barriers." Pub. L. No. 109-234, 120 Stat. at 480. Then, in fiscal year 2008 Congress provided that \$247 million of amounts provided for DOD Operation and Maintenance, Defense-Wide, shall be available for

support to DHS, including “installing fences and vehicle barriers.” Pub. L. No. 110-116, 121 Stat. at 1299. The 2006 and 2008 line-item appropriations expired on September 30, 2007 and September 30, 2008, respectively, which means they are no longer available to cover new obligations. GAO, *Principles of Federal Appropriations Law*, Vol. I, 3rd ed., ch. 5, § D.1, GAO-04-264SP (Washington, D.C.: Jan. 2004).

Here, DOD’s authority to construct fences in support of the counter-drug activities of other agencies has been in place since fiscal year 1991, and DOD has received a lump sum appropriation for its counter-drug activities for each fiscal year starting with 1989.<sup>11</sup> Pub. L. No. 101-510, § 1004; Pub. L. No. 100-463, 102 Stat. at 2270-16. Thus, DOD’s authorities and appropriations for counter-drug support activities existed before and continue to exist after the line-item appropriations for 2006 and 2008. With no currently available line-item appropriation for this purpose, and without a statutory means of reimbursement from DHS, DOD’s Drug Interdiction and Counter-Drug Activities, Defense, appropriation is the appropriate source of funds to cover DOD’s costs under section 284.

In sum, DOD border fence construction pursuant to section 284 bears a logical relationship to the Drug Interdiction and Counter-Drug Activities, Defense, appropriation; there are no legal prohibitions on the use of DOD’s appropriations for border fence construction undertaken pursuant to section 284; and the Drug Interdiction and Counter-Drug Activities, Defense, appropriation was the appropriate account to use for DOD border fence construction here, as no other account otherwise provides for this activity. We conclude that DOD border fence construction under the terms of section 284 is a proper use of DOD’s Drug Interdiction and Counter-Drug Activities, Defense, appropriation and therefore amounts were used for a permissible purpose, consistent with the purpose statute.

#### DHS waivers and section 8113 of the DOD Appropriations Act, 2019

You also asked whether the Secretary of DHS’s waivers of legal requirements in order to expedite construction of barriers at the southern border by DHS and DOD was consistent with section 8113 of the DOD Appropriations Act, 2019.

In carrying out DHS’s border control mission, the Secretary of DHS exercised authority to waive legal requirements, such as NEPA,<sup>12</sup> to ensure expeditious

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<sup>11</sup> DOD has also received authority, like section 8005, annually since fiscal year 1974 to transfer its appropriations. DOD Appropriations Act, 1974, Pub. L. No. 93-238, title VII, § 735, 87 Stat. 1026, 1044 (Jan. 2, 1974).

<sup>12</sup> NEPA requires federal agencies to evaluate the likely environmental effects of projects they are proposing, generally by preparing either an environmental assessment or a more detailed environmental impact statement. 42 U.S.C. §§ 4321–4347.

construction of barriers along the southern border, including barriers constructed by DHS and barriers constructed by DOD in support of DHS under section 284. Pub. L. No. 109-13, § 102; 84 Fed. Reg. 17185 (Apr. 24, 2019); 84 Fed. Reg. 17187 (Apr. 24, 2019); 84 Fed. Reg. 21798 (May 15, 2019); 84 Fed. Reg. 21800 (May 15, 2019).

Section 8113 of the DOD Appropriations Act, 2019, prohibits use of DOD funds

“to pay the salary of any officer or employee of any agency funded by this Act who approves or implements the transfer of administrative responsibilities . . . to the jurisdiction of another Federal agency not financed by this Act without the express authorization of Congress . . .” Pub. L. No. 115-245, § 8113 (section 8113).

Here, while the Secretary of DHS exercised authority to waive legal requirements in order to expedite barrier construction by DHS and DOD, this does not constitute a transfer of DOD’s administrative responsibilities under section 8113 because DHS exercised its waiver authority with regard to projects for which DHS maintains overall responsibility. With regard to border fences constructed by DOD in support of DHS within the scope of DHS’s February 2019 request, DHS defined the requirements, will take custody of completed fences and operate them going forward, retained responsibility for securing any real estate interest required for project execution, and remained responsible for applicable environmental planning and compliance. Response Letter, Encl. 1. We conclude that waivers of legal requirements by the Secretary of DHS to expedite DHS and DOD barrier construction at the southern border was not a violation of section 8113.

## CONCLUSION

Based on application of the relevant legal provisions to the facts before us, we conclude that DOD’s transfer of amounts into its Drug Interdiction and Counter-Drug Activities, Defense, appropriation to construct fences at the southern border of the United States pursuant to section 284 was consistent with DOD’s transfer authority under section 8005. We are in no position to disagree with DOD’s determination that construction of fences at the southern border pursuant to section 284 was a higher priority, and we conclude that this activity was based on unforeseen military requirements, as the requirement for DOD’s support did not materialize until well into the second quarter of fiscal year 2019. Congress has not explicitly denied either DHS or DOD from constructing border fences and, by contrast, has provided specific authorities for each agency to undertake this activity.

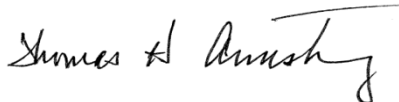
Further, we conclude that DOD’s use of its appropriations for the purpose of border fence construction was consistent with the purpose statute, 31 U.S.C. § 1301(a). There is a logical relationship between construction of fences to block drug smuggling corridors and the counter-narcotics purpose of the Drug Interdiction and Counter-Drug Activities, Defense, appropriation; there are no legal prohibitions on the use of DOD appropriations for border fence construction under section 284; and

the Drug Interdiction and Counter-Drug Activities, Defense, appropriation is the proper account to charge for this activity, as CBP's appropriations for construction, to include an amount for fence construction in the Rio Grande Valley sector, do not specifically provide for DOD's construction of fences under section 284.

In addition, we conclude that DHS's waivers of legal requirements to expedite construction of fences at the southern border was not a violation of section 8113. DHS exercised its statutory waiver authority with respect to projects for which DHS is ultimately responsible and in furtherance of DHS's border control mission, and those projects include fence construction undertaken by DOD at DHS's request.

Congress enacted authority for DOD to construct fences in support of other departments starting in fiscal year 1991 and Congress has enacted authority annually since fiscal year 1974 for DOD to transfer its appropriations. It is these authorities that enabled DOD to accept DHS's request for support and fund construction of fences at the southern border. Although there was no statutory requirement to do so, DOD did not obtain the prior approval of congressional committees before transferring funds, contrary to provisions in its Financial Management Regulation. Nevertheless, DOD's activities were affirmatively permitted by law under the various statutory provisions discussed herein. We express no opinion on the merits of a fence to impede drug smuggling.

If you have any questions, please contact Shirley A. Jones, Managing Associate General Counsel, at (202) 512-8156, or Omari Norman, Assistant General Counsel for Appropriations Law, at (202) 512-8272.

A handwritten signature in black ink, appearing to read "Thomas H. Armstrong". The signature is fluid and cursive, with a long horizontal line extending from the end.

Thomas H. Armstrong  
General Counsel

*List of Requesters*

The Honorable Patrick Leahy  
Vice Chairman  
Committee on Appropriations  
United States Senate

The Honorable Richard J. Durbin  
Vice Chairman  
Subcommittee on Defense  
Committee on Appropriations  
United States Senate

The Honorable Brian Schatz  
Ranking Member  
Subcommittee on Military Construction, Veterans Affairs,  
and Related Agencies  
Committee on Appropriations  
United States Senate

# **EXHIBIT 9**

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

STATE OF CALIFORNIA, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

No. 4:19-cv-00872-HSG

SIERRA CLUB, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

No. 4:19-cv-00892-HSG

**THIRD DECLARATION OF MILLARD F. LEMASTER**

I, Millard F. LeMaster, declare as follows:

1. I am the Deputy Chief, United States Border Patrol Strategic Planning and Analysis Directorate (SPAD), U.S. Customs and Border Protection (CBP), an agency of the

Department of Homeland Security. I have held this position since February 2018. Over the course of my career I have served in multiple roles within the United States Border Patrol (USBP). I entered on duty with USBP in 2000. In that time I have served as a frontline Border Patrol Agent for five years, a Supervisory Border Patrol Agent for two different USBP Stations over the course of four years, and a second line supervisor in the field (Field Operations Supervisor, Watch Commander, and Deputy Patrol Agent In Charge) for two years until promotion to USBP Headquarters. Over the course of more than five years at the headquarters level I have served as an Assistant Chief, Associate Chief, and finally as the Deputy Chief for SPAD.

2. In my current position I am personally aware of the apprehension statistics and drug seizure statistics for the USBP, including apprehensions and drug seizures within the USBP's Yuma, San Diego, El Paso, El Centro, and Laredo Sectors.
3. The statements in this declaration are based on my personal knowledge and information that I have received in my official capacity.
4. Between October 1, 2018 and August 31, 2019, the USBP apprehended over 67,000 people attempting to enter the United States between border crossings in the Yuma Sector. In that same time period, there were over 800 drug events between border crossings in the Yuma Sector, through which the USBP seized over 3,000 pounds of marijuana, over 30 pounds of heroin, over 980 pounds of methamphetamine, and over 43 pounds of fentanyl.
5. Between October 1, 2018 and August 31, 2019, the USBP apprehended over 54,000 people attempting to enter the United States between border crossings in the San Diego Sector. In that same time period, there were over 380 drug events between border

crossings in the San Diego Sector, through which the USBP seized over 2,500 pounds of marijuana, over 1,200 pounds of cocaine, over 250 pounds of heroin, over 3,500 pounds of methamphetamine, and over 100 pounds of fentanyl.

6. Between October 1, 2018 and August 31, 2019, the USBP apprehended over 175,000 people attempting to enter the United States between border crossings in the El Paso Sector. In that same time period, there were over 440 drug events between border crossings in the El Paso Sector, through which the USBP seized over 10,000 pounds of marijuana, over 120 pounds of cocaine, over 25 pounds of heroin, over 300 pounds of methamphetamine, and approximately two pounds of fentanyl.
7. Between October 1, 2018 and August 31, 2019, the USBP apprehended over 32,000 people attempting to enter the United States between border crossings in the El Centro Sector. In that same time period, there were over 195 drug events between border crossings in the El Centro Sector, through which the USBP seized over 190 pounds of marijuana, over 60 pounds of cocaine, over 100 pounds of heroin, over 2,500 pounds of methamphetamine, and over 39 pounds of fentanyl.
8. Between October 1, 2018 and August 31, 2019, the USBP apprehended over 35,000 people attempting to enter the United States between border crossings in the Laredo Sector. In that same time period, there were over 300 drug events between border crossings in the Laredo Sector, through which the USBP seized over 34,000 pounds of marijuana, over 520 pounds of cocaine, over 25 pounds of heroin, and over 530 pounds of methamphetamine.
9. This declaration is made pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the foregoing is true and correct to the best of my current knowledge.

Executed on this 23rd day of October, 2019.

A handwritten signature in black ink, appearing to read 'M. LeMaster', with a large, sweeping flourish extending from the end.

Millard F. LeMaster  
Deputy Chief  
Strategic Planning and Analysis Directorate  
United States Border Patrol