

Private Citizens/Organizations

Peg Briney
1406 Highland Road
Roswell, NM 88201

JAN 29 1999

January 25, 1999

ATTN: ATZC-CSA
Mr. Andrew J. Vliet, DPhil
McGregor Range
Military Land Withdrawal
U.S. Army Air Defense Artillery Center and Fort Bliss
P.O. Box 6020
Fort Bliss, Texas 79906

Dear Mr. Vliet:

Thank you for this opportunity to respond to the draft LEIS regarding the McGregor Range.

85 | I opt for alternative number 6 of the draft document which suggests that Culp Canyon be designated as a wilderness area by the U.S. Congress and the irreplaceable Otero Mesa plus the foothills of the Sacramentos be designated as a National Conservation area!

The many reasons for the above suggestions have been offered by the BLM, by the Sportsman from several counties and by the Ranchers who seem to have an agreement with the Sierra Club!

I comprehend why the U.S. must rent our bases to foreign governments - save US \$, but for the fox telling the hen, "Sit quietly while I have you for lunch," is a little much!

As I understand, the German Air Force refuses to fly on Sundays, also Holloman is close to Bliss where other German nationals are stationed - thus facilitating a shuttle for those who wish to fly to Germany.

86 | Previously, I stated that I would like to see the utilization rate data for existing Bombing, Fighter planes bases, ranges, not only of the Air Force, but also of the Army, Navy and Marine Corps.

The U.S. Military must recognize that the Population of the US and the world is increasing while the land mass is not (if it is, it is by incremental amounts).

Therefore, better utilization of existing military areas must be made - Lands such as the Otero Mesa and surrounding areas must be returned to full public utilization.

Peg Briney
National Director-at-Large
Izaak Walton League of America

85. The Army appreciates your involvement in the environmental analysis process for the renewal of the McGregor Range military land withdrawal. Your comment was considered during preparation of the final LEIS and has become a part of this public comment response document for congressional review.

86. Existing and proposed airspace utilization relative to the *Proposed Expansion of GAF Operations at Holloman AFB, New Mexico*, is presented in Chapter 2 of the EIS evaluating that action. It was prepared by the USAF in April 1998. The Army utilization rates for the McGregor Range airspace are described in Section 3.2 of the LEIS.

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WILLIAM F. BRINEY, M.D., F.A.C.S. COL AUS (RET)
1406 HIGHLAND ROAD • ROSWELL, NEW MEXICO 88201

626-1089 623-1244

2 Feb 99

FEB 4 1999

Dr Anay Vliet
Program Manager
McGregor Range Military Land
Withdrawal Renewal
U.S. Army Air Defense Artillery Center and
Ft Bliss
attn: ATZC-CSA
PO Box 6020
Ft Bliss, Texas 79906

Dear Sir:

By this writing I wish to comment for your review on the issue of the McGregor Range Land Withdrawal Renewal. The McGregor regulatory Environmental Impact Statement offers six alternatives.

Alternative one - the Army's proposed action provides no opportunity to correct the problem of degradation of this unique environmentally valuable area and is therefore unsuitable.

Alternative five - the no action alternative is equally unsuitable as it would block essential military ground operations in the area.

Alternative two is unsuitable as it would renew the withdrawal of Otero Mesa, the area which has great environmental value.

Alternatives three and four have value as offering opportunities to protect these environmentally valuable areas but

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WILLIAM F. BRINEY, M.D., F.A.C.S.

1406 HIGHLAND ROAD • ROSWELL, NEW MEXICO 88201

425-1889

87

I urge selection of alternative six as it would offer protection for the areas most in need of it as well as altering the land use management of the area by means of the designation of the area as a National Conservation Area.

Since the Congress will be the ultimate source of the withdrawal action there are several issues that should be addressed:

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1) the Otter Mesa and foothills must be provided protection by restrictions on various types of military mission allowable

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2) continued public access and natural resource management by the BLM must be continued

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3) the withdrawal should be in keeping with the mission of Ft Bliss utilizing the military's own 20 yr planning action

Additionally, I note that no matter which alternative is selected military aircraft training will continue and this raises the issue of the proposed action to build a bombing range on the Otter Mesa. This is totally incompatible with the proper use of this area. As this issue is not in the McGregor draft LEIS, may I have a copy of the draft EIS referring to this issue.

Thank you for the opportunity to comment and please include these remarks in the official record.

Sincerely yours
William F Briney

3-47

87. The Army appreciates your involvement in the environmental analysis process for the renewal of the McGregor Range military land withdrawal. Your comment was considered during preparation of the Final LEIS and has become a part of this public comment response document for congressional review.

88. Your comment was considered during preparation of the Final LEIS and has become a part of this public comment response document for congressional review.

89. The Army's proposed action continues the current public access and BLM co-management of McGregor Range.

90. The Army employs various planning cycles for different aspects of its mission. For example, the Army uses a 6-year programming cycle for operational activities with facility planning over a 20-year horizon. Doctrinal and equipment life-cycle planning can extend over a period of 40 years or more. The proposed 50-year withdrawal period encompasses each of these periods and enables long-term national security plans to rely on a stable land resource.

Different (shorter or longer) withdrawal periods would not substantially change the environmental impacts of a land allocation decision. Continuing stewardship and compliance activities would be required regardless of duration. Public and/or agency participation in ongoing environmental management activities on McGregor Range is assured through existing laws, regulations, and policies as listed in Table 1.6-1. The Army is committed to continuing public participation under NEPA as major new actions that could significantly affect the environment are proposed for the installation. The McGregor Range RMPA, jointly prepared by the BLM and the Army provides for continuing public participation. The annual RMP update informs the public of the progress made in implementing the RMPA. The Army's INRMP and ICRMP contain provisions for agency coordination and revision as necessary every 5 years.

Continued on Next Page

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90. Continued

Together, these regulatory requirements, policies, and procedures will ensure opportunities for both public and agency input into the future.

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**BURLINGTON
RESOURCES**

FEB 11 1999

MID-CONTINENT DIVISION
February 4, 1999

VIA: E-MAIL
mcgregor@emh10.bliss.army.mil

Dr. Andy Vliet, DPhil
Program Manager, McGregor Renewal
U. S. Army Air Defense Artillery Center & Fort Bliss
Attn: PO. Box 6020
Ft. Bliss, Texas 79906

Re: Draft Legislative Environmental Impact Statement
McGregor Range Land Withdrawal Renewal

Dear Mr. Vliet:

Burlington Resources Oil & Gas Company ("BR") appreciates the opportunity to provide comments on the McGregor Range Land Withdrawal Legislative Environmental Impact Statement (LEIS). We participated in the public scoping via letter dated January 8, 1998.

BR is the largest independent (non-integrated) oil and gas exploration and production company in the United States in terms of total domestic proved equivalent reserves. Those reserves were estimated to be equivalent to 8.0 trillion cubic feet of natural gas (TCFE) on December 31, 1998. We are the lessee of approximately ten- percent of the federal leases held by production and operate approximately ten percent of all wells located on federal oil and gas leases. BR currently has interest in the Bennett Ranch Unit, a recent commercial discovery east of McGregor Range and nominated for leasing over 200,000 acres in Otero County in early 1998. Therefore we are extremely interested in how oil and gas resources and associated activities will be managed by this LEIS.

Based upon preliminary geologic understanding of the McGregor Range, BR believes this area to have potential for oil and gas exploration and production. More subsurface evaluation of this area, such as seismic activity and/or wildcat drilling, is needed before further conclusive information can be determined. At a minimum BR believes that the McGregor Range, currently the areas open for multiple use, should be available for leasing.

The following are issues and concerns that we believe should be considered prior to the publication of the Final LEIS:

- ♦ As stated in our "scoping" letter, BR seeks understanding of why the 271,000 acres, currently designated for non-military co-use, does not provide for mineral exploration. The LEIS, **Section 3.1.2.2 Nonmilitary Use**, states, "about 100,00 acres are open for oil and gas, and geothermal leasing....." Moreover, this issue, our question, was not addressed in **Section 1.5.2.2 Issues Identified in Scoping**, page 1-15 in the LEIS.
- ♦ **Sec 2.1.2 Nonmilitary Uses of Withdrawn Land (under Alternative 1, page2-13):** This section does not provide for mineral leasing, however does provide for other multiple uses.

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91. We agree that more subsurface evaluation of McGregor Range is needed to better evaluate the potential for oil and gas production. As stated in the *Energy and Minerals* subsection (page 3.1-6) in Section 3.1.2.2 in the *Land Use* chapter, about 100,000 acres of the range currently are open for oil and gas leasing, subject to Army approval. No revisions to the text are necessary.
92. This issue was added to Section 1.5.2.2, *Issues Identified in Scoping*. The RMPA and the Proposed RMPA, *Final Environmental Impact Statement for McGregor Range*, that are referenced in the Section 1.5.3, specifically address issues relative to leasable and locatable minerals. The decision to open only 100,000 acres due to suitability for leasable minerals was discussed in those documents.
93. A reference has been added to the end of the first paragraph in Section 2.1.2, as follows: "Exploration and development of mineral resources are managed by the BLM in accordance with the White Sands RMP as amended."

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McGregor Range LEIS Comments
February 4, 1998
Page 2 of 2

93
Cont.

BR suggests that mineral leasing be considered in this section or a justification as to why it is not. The development of mineral resources is an integral part of multiple use management programs providing the benefits of increased domestic supplies of oil and gas along with substantial federal revenues from lease and production sales.

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◆ The discussion on oil and gas in **Section 3.5 Earth Resources**, tends to be vague and lacking current science. It would be beneficial to add the number of wells per township or number of wells per square miles to the first paragraph on page 3.5-9 for clarification and understanding. The second paragraph tends to be speculative and opinionated; not factual. It should make mention of the recent discovery located on Otero Mesa. The third paragraph is speculative as well; it would be difficult to determine reservoir capacity based upon what little exploration activity has occurred in the past. This paragraph also mentions that there have been no formal requests for exploration on McGregor Range; however there has been "informal" interest—a seismic spec shoot.

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◆ **Section 4.10 Socio-economics:** Socioeconomic considerations and benefits from oil and gas activities were not considered in the LEIS; "Preliminary investigations indicate low to moderate potential for oil and gas resources, and petroleum exploration and development on the range appears unlikely." BR believes that socio-economics relating to petroleum exploration and development be discussed in this section. Oil and gas exploration and development would clearly be beneficial to the local economy of Otero County. Under the current management plan, McGregor Range military employees tend to live in El Paso. Otero County does not significantly benefit from this arrangement.

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◆ Under the current McGregor Range Management Plan, mineral leasing is addressed in the Memorandum of Understanding (MOU) between the New Mexico BLM and the U.S. Department of the Army Air Defense Artillery Center and Fort Bliss. (See Appendix A in the draft LEIS.) BR believes that legislation should be considered to address mineral leasing. Legislation may be the vehicle for the MOU so that it extends through, and is not affected by the expiration of the McGregor Range LEIS. This method would also eliminate military discretion when addressing leasing matters. However, the BLM must ensure their management practices are in accordance with their multiple use mandate.

97

◆ While BR appreciates the military's need for the lands within the McGregor Range, BR supports alternatives that would allow oil and gas activity along with other multiple uses. Examples of energy exploration and development operations taking place on military ranges are numerous including: China Lake Naval Base in California and Ft. Chaffe in Arkansas.

Again, we thank you for the opportunity to comment on the McGregor Range Land Withdrawal Renewal LEIS. Please contact me at (915) 688-9042 if you have any questions in regards to our comments or to oil and gas exploration and development operations.

Sincerely,



Eileen D. Dey
Regulatory Compliance Supervisor

94. The information on oil and gas exploration in the Tularosa Basin in Section 3.5, *Earth Resources*, is a general summary and is not intended to go into specific detail. The information was summarized from the *Minerals and Energy Resource Assessment of the McGregor Range*, August 1998, prepared for the withdrawal application. Additional information from this study is provided in Appendix C of the LEIS. However, Section 3.5.1 discusses energy resources such as oil and gas and Figure 3.5-1 shows the locations and depths of oil test wells in the McGregor Range area. The information in Section 3.5.1 was obtained from the most recent appraisals available. Obviously, when and if significant discoveries are made in the basin, the appraisals will require revision. The recent discovery on Otero Mesa, east of McGregor Range is discussed in the section and was mentioned previously in Section 3.1.2.2. We have no information on the "seismic spec shoot," but the paragraph on page 3.5-9 notes the expression of "informal" interest in future exploration by oil companies. No revisions to the text are necessary.

95. Data necessary to evaluate the socioeconomic effects of oil and gas development on McGregor Range was not available during the development of this LEIS. Information required for such an analysis includes the number of employees that would be committed to the effort, where they would reside, what their wage scale would be, when the exploration and development would take place, the amount of the oil and gas to be placed on the market, the expected market price, and the costs associated with the exploration and drilling. The geotechnical probability of the occurrence of developable deposits was discussed in Section 3.5 as summarized from the minerals and energy study (U.S. Army, 1998g) prepared for the withdrawal application.

Continued on Next Page

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McGregor Range Land Withdrawal Public Comment and Response Document

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Continued

96. As discussed in Section 3.1.2.2, McGregor Range is closed to locatable minerals. Under the McGregor Range RMPA and the 1990 MOU between the Army and the BLM, there are provisions for 5-year reviews of the possibility of opening a portion of McGregor Range to locatable mineral exploration and development. Portions of McGregor Range are open to oil and gas and geothermal leasing and for saleable materials disposal. Additional legislative authority for minerals leasing is not required.
97. The Army appreciates your involvement in the environmental analysis process for the renewal of the McGregor Range military land withdrawal. Your comment was considered during preparation of the final LEIS and has become a part of this public comment response document for congressional review.

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Written Comment Sheet
McGregor Range Land Withdrawal Renewal
Draft Legislative Environmental Impact Statement

Thank you for your input

NOV 12 1998

PLEASE PRINT

DATE November 9, 1998

98

I would appreciate knowing how McGregor Range land, and particularly my own, will be affected by New Mexico Highway Department's widening of U.S. 54 in an extension of the freeway from the Texas border.

If that is addressed in the report, I don't find it.

Thank you for your courtesy in sending the reports and newsletter.

Marjorie Graham

NAME:

ADDRESS: Marjorie F. Graham
2915 Federal Ave.
CITY: El Paso, TX 79930

CITY:

STATE, ZIP CODE

PHONE NUMBER (915) 526-7675
Area Code

Please check if you would like to receive a copy of the Final LEIS (Phone Number Required for Federal Express Delivery)

Please Hand This Form In or Mail BEFORE FEBRUARY 5, 1999

Dr. Andy Vilet, Program Manager
U.S. Army Air Defense Artillery Center and Fort Bliss
ATTN: ATZC-CSA (LEIS Comments)
P.O. Box 6020
Fort Bliss, Texas 79906
Email: mcgregor@emh10.bliss.army.mil

98. The Army appreciates your involvement in the environmental analysis process for the renewal of the McGregor Range military land withdrawal. However, specific information regarding the proposal for widening U.S. Highway 54 along McGregor Range was not available during the preparation of this report.

Private Citizens/Organizations

Written Comment Sheet
McGregor Range Land Withdrawal Renewal
Draft Legislative Environmental Impact Statement

JAN 23 1999

Thank you for your input

PLEASE PRINT

DATE 1-18-99

Rather than express thoughts over sections of the various 6 alternatives, I will just like to give an overall review. I have been involved in several Federal DLEIS and found this one not much different than previous ones reviewed. There are always some controversies, politics, and often threatening opposition to whatever is recommended.

One section is noted with specific comments only

My observations of this particular LEIS was one which I wish I had had the time and commitment to review more closely. An on-site review of some of the areas being considered for a return to the public domain would have been nice as well. I believe that many of us would have found an on-site review much more informative. Maybe I missed the offer for a tour since I live in Carlsbad, NM.

Alternative 1 probably is the most sensible option but Alternative # 6, where Congress could designate the Otero Mesa and Sacramento Mountain foothills as a National Conservation Area and Culp Canyon as a wilderness area is a most intriguing idea. I would like to study this alternative in more detail if it is considered.

I have serious concerns about turning any previously "protected lands being "returned to or put into public domain. I find few peoples willing to "take care" of what is given to them.

Section 4.8 Biological resources - Often, our protected lands, especially those on military reservations are unique "islands" of biodiversity. The United States Government should access any changes carefully. Military lands are often an untouched and unique ecological system.

Concerns about fire hazards seem trivial at best. Accidental fires produced by humans have little impact compared to what nature has to offer. It is seen regularly that prescribed burns do much to build a healthier environment. Animals will survive as will the diversity of other biological specimens.

End of my comments for this LEIS. Although I have indicated that I do not wish to receive a copy of the final LEIS, I would be most interested in being kept informed of all future developos of the McGregor Range Land Withdrawal Renewal process.

NAME: Patricia L. Jablonsky
ADDRESS: 604 Southern Sky
CITY: Carlsbad
STATE, ZIP CODE New Mexico, 88220
PHONE NUMBER (505) 887-6668
Area Code

Please check if you would like to receive a copy of the Final LEIS (Phone Number Required for Federal Express Delivery)

(No)

Please Hand This Form In or Mail BEFORE FEBRUARY 5, 1999

Dr. Andy Vliet, Program Manager
U.S. Army Air Defense Artillery Center and Fort Bliss
ATTN: ATZC-CSA (LEIS Comments)
P.O. Box 6020
Fort Bliss, Texas 79906
Email: mcgregor@emh10.bliss.army.mil

99. The Army's proposal would continue the record of sound environmental stewardship established over the past 40 years.

Private Citizens/Organizations

Written Comment Sheet
 McGregor Range Land Withdrawal Renewal
 Draft Legislative Environmental Impact Statement

JAN 28 1999

Thank you for your input

DATE 1-22-99

PLEASE PRINT

Comment Location in Document (Include page and line numbers or broader information)	Comment and Suggested Improvement
100 ALTERNATIVES 1-6	NO MENTION OF GERMAN BOMBING RANGE ON OTERO MESA. PLEASE BE MORE SPECIFIC ON THIS IMPACT. XXXXXX
101 ALL ALTERNATIVES	STRESS ENVIRONMENTAL IMPACT ON HUMANS AND ANIMALS OF LOW FLYING AIRCRAFT. ADD IMPACT ON RETIREMENT FOLKS AVOIDING THE ARPA ON BASIS OF ENVIRONMENTAL IMPACT ADVERSELY IMPACTING RETIREMENT LIVING.
102 ALT. 2 - OPERATIONAL IMPACTS PATRIOT SCENARIOS REDUCED 33%	ADD A PLAN WHEREBY FT. BLISS WORKS WITH THE MISSILE RANGE FOR FIRING OF PATRIOT MISSILES AND/OR OTHER FIRINGS, THUS ELIMINATING NEED FOR MILITARY USE OF MCGREGOR RANGE

**** CONTINUE ON BACK FOR MORE SPACE ****

NAME: ANNA J MILLICAN
 ADDRESS: PO Box 87
 CITY: HIGH ROLLS, NM
 STATE, ZIP CODE: 88325
 PHONE NUMBER: (505) 682-3066
Area Code

Please check if you would like to receive a copy of the Final LEIS (Phone Number Required for Federal Express Delivery)

PLEASE HAND THIS FORM IN OR MAIL BEFORE FEBRUARY 9, 1999 TO:

Dr. Andy Vliet, Program Manager
 U.S. Army Air Defense Artillery Center and Fort Bliss
 Attention: ATZC-CSA (LEIS Comments)
 P.O. Box 6020
 Fort Bliss, Texas 79906
 Email: mcgregor@emh10.bliss.army.mil

100. The Army's principal requirement for McGregor Range is to support ADA training, and other activities such as the USAF tactical target complex are discussed throughout the document. Table ES-3 in the Executive Summary illustrates the capability for training that requires air-to-ground surface impact areas as the Otero Mesa site. This refers to the USAF target complex. As stated in the LEIS Section 1.5.3, *Other Environmental Analyses and Decisions Relevant to the Action*, the USAF EIS was incorporated by reference into this LEIS. In general, the tactical target complex is discussed under each resource evaluation of Alternative 1 in this LEIS. Details of the operational and environmental impacts of the tactical target complex may be found in the USAF document. The tactical target complex is shown on Figure 2.1-1.

101. The alternatives of this LEIS include renewing the withdrawal in its current configuration or withdrawing a different amount of land. Although the No Action Alternative would allow retirees and others more access to the range, it is unlikely that any of the alternatives presented to Congress will generate activities that significantly affect retirement living in the region.

102. Under DoD policy for the use of major range and test facilities such as WSMR, evaluation of routine use for training such as conducted at McGregor Range is not permitted.

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PAGE 2	YOUR NAME:
Comment Location in Document (Include page and line numbers or broader information)	Comment and Suggested Improvement
<p>Act 5: "INCREASED SOIL EROSION FROM CLEAN-UP ACTIVITIES & GRAZING..."</p>	<p>"GRAZING CAUSING EROSION" IS A PREJUDICIAL STATEMENT NOT BACKED BY EVIDENCE. OF RANCHERS USING PERMITS TO UTILIZE THE LAND FOR GRAZING THEIR CATTLE. PLEASE CLARIFY THAT CATTLE GRAZING WOULD NOT INCREASE EROSION.</p>
<p>choice</p>	<p>MY VOTE GOES FOR REDUCING THE AMOUNT OF THE PUBLIC LAND CONTROLLED BY THE MILITARY; SO ALTERNATIVE 5 WOULD BE THE BEST FOR THE AMERICAN PEOPLE.</p>
	<p>WE RESIDENTS COULD LIVE WITH ALL BUT ACT 1 AND THE NEW GERMAN LOW-FLYING BOMBING RANGE.</p>
<p>general</p>	<p>The longest journey begins with a single step. No one in our area trusts the military and feels even folks never have us the full truth or lie deliberately lie to us. you people working on this project could handle it in such a way as to take a step toward letting the common people feel there are some folks left in the military and/or government who can be trusted! what a refreshing change that would be.</p>

Private Citizens/Organizations

NEW MEXICO NATURAL HISTORY INSTITUTE

A Nonprofit Corporation
1750 Camino Corrales
Santa Fe, New Mexico 87506-7502

5 February 1999

McGregor Range Military Land Withdrawal Renewal
U. S. Army Air Defense Artillery Center and Fort Bliss
ATTN: ATZC-CSA
P. O. Box 6020
Fort Bliss, Texas 79906

Dear MRMLWR:

It's a big book and it's taken a long time to get through it. Clearly written, with much valuable information.

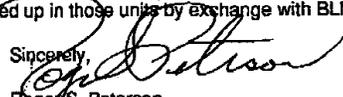
However, some of the information is hard to believe. In particular in Table ES-1 on consequences of the six alternatives for army operations, effects seem exaggerated. From our understanding of where operations are carried out or where, it appears, they could easily be relocated, a loss of 89 to 100% of the Patriot program and of 89 to 100% of the McGregor Launch Complex under Alternative 6 seems completely unrealistic. Just shift the targets a bit to the west.

One military mission is environmentally unacceptable and deserves to lose 100% under all alternatives: the proposed USAF tactical target on Otero Mesa. That kind of pressure—especially including aircraft noise—would be extremely damaging to wildlife and to the fine habitat of the Mesa.

We favor Alternative 6, perhaps modified as discussed in the next paragraph. Our reasons for choosing 6 are (1) it protects the most valuable natural resources of the McGregor Range without destroying too much of the military usefulness of the Range; (2) it would bring some balance between the military's very extensive land-holdings in south-central New Mexico and the public's right to use public lands; (3) it would create Culp Canyon Wilderness, which is the right designation for those out-of-the-way foothills lands; and (4) it would preclude the use of Otero Mesa as an aircraft target range—a terrible idea.

It is unfortunate that most of the fee-owned land would be excluded from McGregor Range under Alternative 6. To meet this problem we propose exchange of those lands for BLM lands in the western part of the Range. We do not think that natural-resource values in Training Units 10, 11, and the western half of 12 are as high as values to the east, and we think that retention of those areas in the Range would not much damage the public interest. Were that done, the fee-owned lands could be blocked up in those units by exchange with BLM.

Sincerely,


Roger S. Peterson
Secretary

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103. For safety purposes, it is necessary to keep the SDZs within the Range boundaries. Therefore, a simple shift to the west is not feasible.

104. Aircraft noise and other potential impacts from development of the tactical target complex was presented in the *Final EIS, Proposed Expansion of GAF Operations at HAFB, New Mexico*, April 1998.

105. The Army appreciates your involvement in the environmental analysis process for the renewal of the McGregor Range military land withdrawal. Your comment was considered during preparation of the final LEIS and has become a part of this public comment response document for congressional review.

106. Your comment was considered during preparation of the final LEIS and has become a part of this public comment response document for congressional review.

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Private Citizens/Organizations



EL PASO REGIONAL GROUP
800 S. PIEDRAS ST. • EL PASO, TEXAS 79905 • (915) 532-9645
Mailing Address: P.O. Box 9191 • El Paso, Texas 79983

February 8, 1999

FEB 9 1999

Dr. Andrew Vliet
Program Manager, McGregor Renewal
U.S. Army Air Defense Artillery Center and Fort Bliss
P.O. Box 6020
Fort Bliss, TX 79906

Re: McGregor Range Land Withdrawal Renewal
Draft Legislative Environmental Impact Statement

Dear Dr. Vliet:

The El Paso Regional Group of the Sierra Club has a long-standing interest in McGregor Range and resource-management issues involving the Range. We offer these comments on the Draft Legislative Environmental Impact Statement (EIS) for renewal of the land withdrawal for the Range.

- 1. One concern we have is with the length of the withdrawal. We believe 50 years is too long. The Draft Fort Bliss Mission and Master Plan has a 20-year planning horizon. The withdrawal should match this time frame, and we ask that the alternative of a 20-year withdrawal be evaluated.
2. (p. ES-14, lines 4-14) We request that the measures found in the MOU and RMPA and alluded to here be sent to Congress for inclusion, as mandated actions, in the withdrawal legislation.
3. (p. 2-2, lines 11-13) If the Forest Service lands within McGregor Range are used under a Memorandum of Understanding (MOU) with the Forest Service rather than being withdrawn, why can't other areas, such as Otero Mesa, be used under similar MOUs? The Alternatives section should discuss this option for the lands that would not be withdrawn under Alternatives 2, 3 and 4.

Also, we note that the MOU between the Forest Service and Fort Bliss is dated 1971. The 1988 Master Agreement between the Department of

"To Explore, Enjoy and Protect the Earth."

107. The Army employs various planning cycles for different aspects of its mission. For example, the Army uses a 6-year programming cycle for operational activities with facility planning over a 20-year horizon. Doctrinal and equipment life-cycle planning can extend over a period of 40 years or more. The proposed 50-year withdrawal period encompasses each of these periods and enables long-term national security plans to rely on a stable land resource.

Different (shorter or longer) withdrawal periods would not substantially change the environmental impacts of a land allocation decision. Continuing stewardship and compliance activities would be required regardless of duration. Public and/or agency participation in ongoing environmental management activities on McGregor Range is assured through existing laws, regulations, and policies as listed in Table 1.6-1. The Army is committed to continuing public participation under NEPA as major new actions that could significantly affect the environment are proposed for the installation. The McGregor Range RMPA, jointly prepared by the BLM and the Army provides for continuing public participation. The annual RMP update informs the public of the progress made in implementing the RMPA. The Army's INRMP and ICRMP contain provisions for agency coordination and revision as necessary every 5 years. Together, these regulatory requirements, policies, and procedures will ensure opportunities for both public and agency input into the future.

108. The MOU that is incorporated in the RMPA is presented in Appendix A of the LEIS. This document is a part of the case file information that will support the legislation.

109. The FLPMA [43 CFR 1702(j)] states the purpose of a withdrawal is to limit activities in order to maintain other public values or to reserve the area for a particular public purpose or program. Minimizing public safety risks from military training and testing activities requires reserving McGregor Range from settlement, sale, location, or entry. It

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McGregor Range Land Withdrawal Public Comment and Response Document

Private Citizens/Organizations

Dr. Andrew Vliet
February 8, 1999
Page 2

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cont.

Defense and the Department of Agriculture concerning use of National Forest System lands for military activity (pp. 4-35 to 4-38) would appear to supersede the 1971 MOU. The 1988 Master Agreement requires that the Department of Defense seek special use authorizations for military training activities on National Forest System lands (Sec. V). Further, it stipulates that those training activities are actions that require a NEPA analysis (Sec. III.B). Has the Army complied with these requirements in its training activities on Lincoln National Forest lands? We request discussion of these points; it would help clear up any misunderstandings we may have.

110

4. (pp. 2-4, 2-5; Figure 2.1-1, Table 2.1-1) This figure and table appear to indicate that Training Area 10 is closed to public access. Our membership has historically been granted access to this area, which has some of the most appealing scenery on McGregor Range. Will it now be off limits to the public? We would strongly oppose such a closure. Please clarify the access status of these lands.

111

5. (p. 2-10, lines 41-42; p. 3.1-12, lines 41-50; p. 4.1-5, lines 16-17) The analysis of recreational use of McGregor Range is flawed and misleading. For several reasons, the draft EIS underestimates the level of recreational interest in the Range:
- Up until last summer, public access to entire training areas was denied any time even a single Fort Bliss individual or contract employee was conducting activities in any part of a training area. This policy included weekends, the time when the public would most likely seek access.
 - This restrictive policy was changed last summer to allow greater public access, but the data used for the EIS analysis were collected under the old policy. Those data thus do not reflect current or future conditions.
 - Members of the public who were denied access under the old policy were not always recorded as seeking access. Our members, on being denied access, have specifically asked the Fort Bliss staffer taking their call at the check-in number if Fort Bliss is supposed to log in the request. The response has always been, no, they don't do that.
 - The process for obtaining access permits is difficult and cumbersome. It discourages the public from seeking permits. The Range Enforcement Office is an hour's drive from many parts of El Paso. It is closed on weekends, forcing many individuals to use vacation time if they want to get a permit.

109. Continued

is incumbent upon the federal government to control public access to hazardous areas through withdrawal or transfer.

Military activities in the Lincoln National Forest were described in the Army's EIS for the Land Use Withdrawal McGregor Range Fort Bliss, Texas, August 1977. Present military activities are described in the *Draft Fort Bliss Mission and Master Plan PEIS*, July 1998.

110. Figure 2.1-1 has a diagonal line hatch pattern to denote areas of public access. TA 10 is included in the portion of McGregor Range that the Army proposes for continuing public access.

111. As recognized in the comment, the policy restrictions on public access have been modified during the development of this LEIS. The Army has considered the comments received throughout the public involvement process. The data required to estimate future public use that would allow quantitative evaluation in the final LEIS are not available. All persons are required to coordinate access and use with the Range Commander (through the Range Scheduling Office) to ensure safety and to avoid interference with military missions. This procedure applies to government employees, contractors, and the public at large. Current access procedures allow concurrent use of some areas for a military mission or Army and BLM maintenance and resource survey activities, with public recreational use. Members of the public can obtain annual recreation access permits from either the Army or BLM. The Army is currently considering procedures that would be automated to the degree possible to facilitate public access while maintaining public safety.

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111
cont.

It would seem the number of people desiring access could be much higher than the number actually granted access. The EIS should be corrected to reflect this. We request that a clear access policy be stated in the EIS and in the withdrawal legislation, so access will not be subject to change with each new commander.

Finally, though the EIS covers a 50-year time frame, it does not take into account the inevitable increase in outdoor-recreational interest that will accompany population growth in the Southwest during this period. We request that the Environmental Consequences section be revised to indicate this expected increase in recreational interest.

112

6. (p. 2-13, lines 40-42) In our comments on the Draft Programmatic Environmental Impact Statement for the Fort Bliss Mission and Master Plan, we noted that, ultimately, the Army and the BLM are going to have to choose between training or grazing on Otero Mesa. The grassland ecosystem does not have the capacity to sustain both activities. The McGregor Withdrawal EIS must discuss this issue and arrive at a decision on whether the Army will commit to a policy of not training in areas where grazing is occurring on black grama grasslands.

113

7. (p. 2-15, lines 4-8) As discussed in comment 5 above, the current policy for obtaining access permits actively discourages the public from getting permits. Why make people go all the way to McGregor Range? Why can't the Fort Bliss post issue permits? In the computer age, one would think this would be simple.

Also, why can't permit holders bring a friend when they visit the Range? Current policy prohibits a permit holder from, for example, bringing an out-of-town weekend guest on the Range for a hike. Why can't the permit cover a limited number of accompanied guests?

We request that these issues be addressed in the EIS. We are very concerned about the current overly restrictive permit policy.

114

8. (p. 2-21, lines 46-51) Since some of our members work on White Sands Missile Range, we are aware that, during Roving Sands, participants in that exercise use areas all the way from Fort Bliss to the north end of White Sands, near Socorro, New Mexico. It is not at all clear to us how the loss of Otero Mesa, a small area relative to the huge area used in Roving Sands, would significantly affect training. Please explain. Also, could not this area be used under agreement with the BLM, since it is only used once a year?

112. The two activities mentioned (grazing and training) are compatible actions and have co-existed on Otero Mesa since 1966. This area is considered by many to be in excellent environmental condition after almost 34 years of co-use. Your comment was considered during preparation of the final LEIS and has become a part of this public comment response document for congressional review.

113. The Army is currently considering procedures that would be automated to the degree possible to facilitate public access while maintaining public safety. The request for accompanied guests is being considered by the Range Commander.

114. Section 1.2.2.3 discusses other mission activities on McGregor Range in addition to the annual Roving Sands Joint Training Exercise (JTX). The principal mission that requires the Otero Mesa for on-going military training is the air defense training mission, in particular, the Patriot training. Figure 2.1-2 illustrates a full range of Patriot training scenarios that can be accomplished with the present land withdrawal. Figures 2.2-2 through 2.4-2 illustrate how the loss of Otero Mesa, even though it is a small area relative to the area used for Roving Sands, would significantly affect training for this critical mission.

The FLPMA [43 CFR 1702(j)] states the purpose of a withdrawal is to limit activities in order to maintain other public values or to reserve the area for a particular public purpose or program. Minimizing public safety risks from military training and testing activities requires reserving McGregor Range from settlement, sale, location, or entry. It is incumbent upon the federal government to control public access to hazardous areas through withdrawal or transfer.

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9. (p. 3.8-12, lines 36-38) The public's ability to evaluate the adequacy of the impact analysis is compromised by the absence of information from the biological assessment. The final EIS needs to provide full details of Section 7 consultations.

10. (p. 4.8-39, lines 1-4) We strongly disagree with the statement that no mitigation measures are required. Mitigation is absolutely necessary, especially in light of the proposed increase in use of the black grama grasslands.

Further, we understand Fort Bliss is a Training and Doctrine Command post, but all training is done by Forces Command units. Apparently for this reason, Training and Doctrine Command will not fund any monitoring or mitigation of training impacts created by Forces units. This incredible catch-22 is a major impediment to sound resource management on McGregor Range.

We also understand environmental funds can be, and are at times, diverted for non-environmental projects. For these reasons, we request that the following mitigation measures be discussed in the EIS and submitted to Congress with the EIS:

- a. The withdrawal legislation should commit to a yearly appropriation of environmental funds for impact monitoring and mitigation to make up for the lack of Training and Doctrine Command funds available for this purpose.
- b. Congress should stipulate clearly that these funds could be used only for the above-stated purpose.
- c. The withdrawal legislation should guarantee that the Integrated Cultural Resources Management Plan, the Integrated Natural Resources Management Plan and the Integrated Training Area Management program for Fort Bliss will be funded until expiration of the withdrawal.
- d. The withdrawal should be limited to a 20-year period.
- e. A public oversight or participation process should be established so the public can be brought into the environmental compliance process, become aware of compliance issues, and assist, if appropriate, in their resolution.

115. Fort Bliss has been consulting with the U.S. Fish and Wildlife Service (USFWS) since 1997. The *Threatened and Endangered Species* section of *Affected Environment* (Section 3.8) explains the habitat for listed species that occur, and describes their status. Section 4.8 provides potential impacts on sensitive species of renewing the withdrawal under each of the configuration alternatives.

116. The Army appreciates your involvement in the environmental analysis process for the renewal of the McGregor Range military land withdrawal. Your comment was considered during preparation of the final LEIS and has become a part of this public comment response document for congressional review.

117. The Army appreciates your involvement in the environmental analysis process for the renewal of the McGregor Range military land withdrawal. Your comment was considered during preparation of the final LEIS and has become a part of this public comment response document for congressional review.

118. The Army appreciates your involvement in the environmental analysis process for the renewal of the McGregor Range military land withdrawal. Your comment was considered during preparation of the final LEIS and has become a part of this public comment response document for congressional review.

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cont.

- f. The black grama grasslands should be protected through a commitment to allow either grazing or training, but not both, in any given grama grassland area. The grasslands below the mesa that are designated nationally significant should be set aside from ground disturbance, since these are among the last ungrazed grama grasslands.

Thank you for this opportunity to comment.

Very truly yours,



Laurence Gibson
Chairman



FEB 8 1999

Wildlife Management Institute

Len H. Carpenter, Field Representative
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ROLLIN D. SPARROWE
President

LONNIE L. WILLIAMSON
Vice-President

RICHARD E. McCABE
Secretary

February 3, 1999

McGregor Range Withdrawal,
U.S. Army Air Defense Artillery Center and Fort Bliss,
ATTN: ATZC-CSA, PO Box 6020,
Fort Bliss, Texas 79906

Dear Mr. Vliet:

I am the Southwest Field Representative for the Wildlife Management Institute. The Institute is a private, nonprofit, scientific and educational organization founded in 1911 and dedicated to the restoration, conservation, and sound management of natural resources, especially wildlife, in North America. I have the following comments on the DLEIS for the military withdrawal on McGregor Range, New Mexico.

Overall, the DLEIS is well organized and prepared. It presents a thorough coverage of the issues and provides for a nice range of alternatives. A key finding in the report is the fact that vegetation cover of all major habitat types on the McGregor Range decreased from 1986 to 1996 (Figure G-3; Tables G-5 & G-6). Most of these decreases are more than 10%. This finding should concern all responsible for the long-term stability of this landscape. The disturbing thing is that cover of both shrub lands and grasslands decreased. I can only conclude that this means that there is more bare ground that is absent of any vegetative cover. If this is true, this is a frightening occurrence and suggests that overall land management strategies need to change. In my professional opinion the authors of the FDEIS do not address this finding adequately in the report. The FLEIS should address this finding and thoroughly explore the ramifications.

Given the long-term threat to the overall ecological well-being of this landscape under current management practices it seems that now is the time to make the land use changes suggested in the alternatives. Since the land withdrawal that will occur in this action is long term (50 years) it is critical that alternatives that provide for the protection of key ecological resources are done now. Therefore it seems that either alternative 2 or 3 should be seriously considered if indeed there is serious interest in the environmental impacts of the proposed action. Obviously, alternative 5 or 6

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120

119. The limitations of the methodology used to derive the quantitative results was expressly noted in the LEIS, Section 4.8.7.1. "The images used in the analysis represent a snapshot view of conditions for 2 days 10 years apart, and do not represent trends in vegetation cover. The number of observations over time correlates to the reliability of the trend analysis." This caveat being said, the resources being devoted to development of this monitoring program is an indication of the Army's concern for the long-term stability of this landscape not only from a natural resource management perspective but also from the requirement to have quality training lands available to support the mission.

120. Your comment was considered during preparation of the final LEIS and has become a part of this public comment response document for congressional review.

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McGregor Range Land Withdrawal LEIS 2

would be the best choice for the long-term ecological welfare of the lands in question. Now is the time to protect these valuable natural landscapes and allow opportunity for the American people to enjoy them. However, given the adverse impacts of these alternatives on the military mission it is highly doubtful these alternatives will receive much attention from the Army. The LFEIS should discuss the tradeoffs, benefits, and adverse impacts of each alternative on the long term welfare of the land and on the military mission. As a reader and reviewer I could only wish that the adverse impacts of each alternative on the environment could be as thoroughly and dramatically graphed as were the impacts of each alternative on the military mission in Table ES-1 on page ES-13. Please consider such an approach for the LFEIS.

Finally, in discussions on impacts on wildlife species, especially impacts on amphibians and reptiles and on other sensitive species I find the LFEIS inadequately relays the probable negative impacts of continuing existing land use strategies. Loss of vegetative cover, impacts of man-caused fires, and over all environmental degradation all spell doom for many of these species in a large portion of the land withdrawal. Given the large costs to the taxpayers of this nation when animals become endangered it seems that the negative impacts of the proposed alternatives need to be elucidated better in the LFEIS. Citizens of this country should better understand some of the long-term ecological and financial costs of land management decisions.

Thanks for the opportunity for comment. I request that my concerns and suggestions be considered as the LFEIS is prepared.

Sincerely,



Len H. Carpenter

cc:

R. Sparrowe

wmi\let\mcgregor2

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3-63

121. The Army believes the LEIS has disclosed the potential benefits and adverse impacts of each of the alternative amounts of land that Congress could withdraw for military use. Impacts specific to current or future individual missions and locations have been or will be analyzed in project-specific NEPA documentation. Ways to improve the communication of effects on the environmental resources was considered for the final LEIS.

122. Your comment was considered during preparation of the final LEIS and has become a part of this public comment response document for congressional review.

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HEYCO



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February 8, 1999

FEB 9 1999

Dr. Andy Vliet
Program Manager, McGregor Range Renewal
U. S. Army Air Defense Artillery Center @ Ft. Bliss
P. O. Box 6020
Ft. Bliss, Texas 79906

Re: McGregor Range
Land Withdrawal/Renewal Draft LEIS

Dear Dr. Vliet:

Harvey E. Yates Company (HEYCO) appreciates being able to provide comments for the McGregor Range Withdrawal renewal process. HEYCO is a small, privately owned independent oil and gas operator and producer located in Roswell, New Mexico with current production over 3,000 barrels of oil equivalent per day from over 200 wells. As part of the Yates family of companies, HEYCO has experience in all phases of Oil and Gas operations going back more than 70 years. HEYCO is currently the operator of the Bennett Ranch Federal Unit on which a recent significant gas discovery was made just east of the McGregor Range.

HEYCO is interested in any process under which the McGregor Range lands and the Orogrande Basin would be opened up to oil and gas exploration and operations. Our understanding of the Orogrande Basin leads us to believe that this area has significant potential for oil and gas production from similar hydrocarbon traps and reservoirs as found at Bennett Ranch and the Permian Basin general. HEYCO believes that it is in the region's best interest to facilitate a more thorough subsurface evaluation of this area by way of multiple use and leasing that includes extractive minerals and oil and gas operations.

The following comments and statements reflect concerns that should be addressed prior to the Final LEIS:

DLEIS
pg.#, /line#, Comment

123

CS-1/15-29, ES-1/31-32
The Army's Application is for a 50-year period. No explanation or supporting statement(s) is given here for this time frame, and none of the alternatives are set out for a different time frame. **Comment:** 50 yrs. is too long a period of withdrawal. **REASONS:** Technology evolution is and should be on a faster pace than every 50 yrs.; no connection between the current renewal process and a future process; 50 yrs. greatly exceeds working lifetime of all investigators involved (the last renewal period was for 15 yrs).

124

ES-1/37-39
MOU with USFS has no dates for expiration listed. Will it continue unchanged if USFS lands continue to be withdrawn? No statement is given here.

125

ES-1/44-47
MOU with BLM expires in 2001 unless canceled or renewed. What is proposed by the Army, cancellation or renewal? If renewal, will responsibilities and mission remain the same? No statement is given here.

126

ES-2/15-16
WSMR uses the Fort Bliss Training Complex (McGregor Range) for limited tests. Is this occasional use, or otherwise? What %? Is the converse true as well? Does Ft. Bliss use WSMR for limited tests?

123. The Army employs various planning cycles for different aspects of its mission. For example, the Army uses a 6-year programming cycle for operational activities with facility planning over a 20-year horizon. Doctrinal and equipment life-cycle planning can extend over a period of 40 years or more. The proposed 50-year withdrawal period encompasses each of these periods and enables long-term national security plans to rely on a stable land resource.

Different (shorter or longer) withdrawal periods would not substantially change the environmental impacts of a land allocation decision. Continuing stewardship and compliance activities would be required regardless of duration. Public and/or agency participation in ongoing environmental management activities on McGregor Range is assured through existing laws, regulations, and policies as listed in Table 1.6-1. The Army is committed to continuing public participation under NEPA as major new actions that could significantly affect the environment are proposed for the installation. The McGregor Range RMPA, jointly prepared by the BLM and the Army provides for continuing public participation. The annual RMP update informs the public of the progress made in implementing the RMPA. The Army's INRMP and ICRMP contain provisions for agency coordination and revision as necessary every 5 years. Together, these regulatory requirements, policies, and procedures will ensure opportunities for both public and agency input into the future.

124. McGregor Range includes 18,004 acres of U.S. Forest Service (USFS) lands, which are used by the Army in accordance with a MOU between the USFS and the DA, Fort Bliss. The 18,004 acres of USFS lands are not part of the withdrawal renewal. The USFS lands will continue to be used by the Army under the existing MOU. The following sentence has been added to the text. "The 18,004 acres of USFS are not included in this withdrawal renewal."

Continued on Next Page

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McGregor Range Land Withdrawal Public Comment and Response Document

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Continued.

125. The proposed action and alternatives are briefly described in the Executive Summary beginning on page ES-2. More detailed descriptions of the proposed action and alternatives are presented in Chapter 2, which presents discussions regarding the responsibilities and missions that pertain to each alternative.

126. The WSMR activities that are conducted on McGregor Range are described in Section 1.2.2.3. The U.S. Army Missile Command (MICOM) elements stationed at Fort Bliss use McGregor Range on a regular basis.

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 Program Manager, McGregor Range Renewal
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126
 Cont.

What %? Can that use be expanded?

127

ES-3/44-46
 Military uses of McGregor Lands are defined in two Ft. Bliss Documents. The documents are not in the Appendix, nor referenced to publicly locatable source.

128

ES-4 & 5/
 Under Alternatives 2, 3, & 4, nothing is mentioned as to changes that impact any Army training procedures listed here. Why not? Are there really no current impacts involved? Also nothing is mentioned of Army costs (cleanup or otherwise) to make the change.

129

ES-6/1-19
 Alternative 5 (total return of McGregor Range to public domain) brings up for the first time the subject of land exchange. Maintaining the infrastructure around McGregor Range Camp, McGregor ASP, and Meyer Range seems to be of prime importance to the ARMY even if McGregor Range goes away. The idea of swapping fee-owned holdings for public domain lands, upon which the Army would have sole control as proposed here, seems to be beneficial even if Alternative 5 is not supported. Fee-owned holdings in the Sacramento Foothills most likely would have greater assessed value due to better fresh water rights and therefore could be swapped for a greater (disproportionate) amount of acreage on the Tularosa Basin desert floor flatlands.

130

ES-6/19-23
 McGregor installation facilities that would be relocated elsewhere are mentioned here but no listing is given of viable alternative locations or consolidation sites for such facilities, and cost or cost savings involved.

131

ES-6/28-40
 Culp Canyon WSA has been hanging around for a long time. The Army/BLM should either get it designated as a Wilderness, put it back into multiple use status public domain land, or just drop the designation. Alternative 6, the creation of an NCA (what is involved in this designation—is this just another non-legislative land withdrawal for an undefined length of time and non-specific environmental reasons?) has no explanation given here.

132

ES-7/12-17
 Ongoing environmental effects from mission activities and non-military activities would continue. Are there no ongoing cleanup and restoration activities that go on as well?

133

ES-7/26-27
 Ground troop maneuvering would no longer occur on lands returned to the public domain. This statement is not explained. Does the army already know that the BLM will not grant permits for activities on lands returned to public domain?

134

ES-7/41-45
 Restricted Area airspace could be reconfigured to change the vertical & lateral boundaries and procedures (MOA?). Why are no proposals for change listed with the various alternatives or explained here?

135

ES-8/1-2
 Under alternatives 2, 3, 4, and 5, periodic closures of NM Highway 506 would be reduced or eliminated, which would be a **beneficial impact**. Yes, in fact, if alternatives 2, 3, or 6 are chosen, this road and right of way should be relocated and improved to connect from existing roads near Canon Eduardo Negro to NM 506 on top of Otero Mesa. Additional roads in Otero County and Hudspeth County, TX. should also be improved and paved giving the public access to an alternative route from Alamogordo to El Paso around the Ft. Bliss Military Reservations and WSMR. If Alternative 4 or 5 are chosen the existing road should be improved and paved as part of the return of lands to the public domain.

127. The referenced documents are the *Training Area Development Concept (TADC)* and the *Fort Bliss Mission and Master Plan PEIS*. The following libraries received copies of these documents: El Paso Public Library; Irving Schwartz Public Library; Westside Branch Library; Branigan Memorial Library; Dell City Library; Alamogordo Library; New Mexico State University, Bramson Library; New Mexico State University, Roswell Library; University of Texas at El Paso Library; Cloudcroft Library.

128. The Executive Summary briefly describes the proposed action and alternatives, but does not discuss the resulting impacts. Table 2.7-1 in Chapter 2 summarizes the *Comparison of Alternatives by Resource and Potential Impacts*. Detailed discussions of the impacts resulting from the actions are presented in Chapter 4. Cost analyses to implement the proposed action and alternatives are not typically part of the NEPA process.

129. As discussed in Section 2.5, *Alternative 5 - No Action*, the Army fee-owned in-holdings within the lands returned to the public domain would be exchanged for public lands in TAs 8 and 32, to maintain essential infrastructure around McGregor Range Camp, the McGregor Ammunition Supply Point (ASP), and the Meyer Range Complex. Under the other five alternatives, the lands surrounding this infrastructure would remain withdrawn for military purposes, therefore, land exchanges would not be required.

130. Viable alternative locations for these facilities are not known at this time. However, it is known that should Alternative 5 be implemented, these ranges would no longer be useable for military purposes. Cost analyses of implementing the alternatives are not typically part of the NEPA process.

131. A detailed discussion of the Culp Canyon WSA and NCA designation are provided in Section 2.6. As stated in Section 2.6, these designations would be concurrent with or follow congressional action on the Army's application for renewal of the land withdrawal.

Continued on Next Page

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Continued

132. Military and nonmilitary activities, including restoration and remediation of contaminated areas, would continue under Alternative 1. A discussion of the Installation Restoration Program (IRP) is presented in Section 3.14.3.1.
133. The FLPMA [43 CFR 1702(j)] states the purpose of a withdrawal is to limit activities in order to maintain other public values or to reserve the area for a particular public purpose or program. Minimizing public safety risks from military training and testing activities requires reserving McGregor Range from settlement, sale, location, or entry. It is incumbent upon the federal government to control public access to hazardous areas through withdrawal or transfer.
134. As discussed in Section 2.5, *Alternative 5 - No Action*, restricted airspace above the land area could continue to be used for some aircraft training by Army aviation and USAF units within the region. Section 4.2.5 discusses changes to Restricted Area airspace that could occur should all air-to-ground and ground-to-air activities be discontinued. Any of these airspace actions would follow congressional action on the McGregor Range LEIS and would be evaluated under a separate NEPA process.
135. Your comment was considered during preparation of the final LEIS and has become a part of this public comment response document for congressional review.

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Program Manager, McGregor Range Renewal
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ES-8/17-21
Earth Resources

136

"There would be no impacts to geological resources under any alternative, since the management practices of the current White Sands RMP, as amended by the McGregor Range RMPA, are assumed to continue on all withdrawn, Army fee owned, and public domain lands with the current boundaries of McGregor Range." **Statement is not true!!** This should read... There would be no **additional** impacts to geological resources.....The area, county and country are already impacted by the withdrawal of over a million acres of potentially productive hydrocarbon basin, and the economic impact such activities would generate.

ES-8/29-33

137

This is another statement that currently conducted or planned military exercises could not be held on lands turned over to the public domain. How so, could the Army not apply for activity permits just like everyone else?

ES-9/24-26

138

Water rights from the Sacramento River (which just barely crosses a corner of the Range) and Carrizo Springs (not on McGregor Range) should be transferred to the BLM or the USFS under Alternatives 1-6 not just 5 & 6. The BLM also should not be using diverted water to create **unnatural** habitat for the sake of native species survival or species reintroduction, and it shouldn't be in the grazing rights to the highest bidder business either, unless it is going to do so everywhere. Additional stockpiled Military water rights along the Sacramento Mtn., front and south of Alamogordo and not within McGregor Range, which are not mentioned in the LEIS, should also be given or sold back to the public domain.

ES-10/3-5

139

There is no map summarizing the location, extent and types of Cultural Resources on McGregor Range here. What is the distribution of these resources?

ES-10/26-29

140

The Socioeconomics associated with the military, Fort Bliss, and the implementation of any of the proposed alternatives is significant, but where does nearly all of the money go? It goes to the Texas economy, not to New Mexico, where all of McGregor Range and more than 2/3 of Ft. Bliss's training areas are located. Continued use of McGregor Range and Dona Ana Range by the Army calls for a more significant benefit to the economy of New Mexico. Why doesn't the Army have a permanent cantonment of troops at Sacramento City (abandoned), or at the north end of the Range? Why is there no mention of possible economic impacts or benefits from oil and gas exploration and operations here? (See attached Document 1)

ES-10/30-31

141

Should read.... Additional **possibly significant** impacts can be expected from changes in the manner in which the natural resources of McGregor Range are utilized. Geco-Prakla (Schlumberger) has already proposed (10/98) a 540 mile speculative 2-D seismic survey that would cover a large portion of McGregor Range (This survey has subsequently been revised (2/99) to cover only the area of current access in the northeast corner of the Range. (See attachment 2). This proposed expenditure of approximately \$2,000,000 could kick off a major exploratory effort in the region if it goes forward.

ES-10/45-48

142

Can it be assumed that this means the Army can and will completely clean up all metal, spent armor and unexploded ordnance under Alternative 5 to a level where they assume no future liability will occur? No cost is set out anywhere for remediation and restoration.

ES11/3-5

143

The noise impacts resulting from the approved USAF target complex and the possible helicopter training range are not known or not estimated, just assumed to be insignificant. Are the land use compatibility

136. The LEIS compares the existing conditions on McGregor Range to the conditions that would exist if the alternatives were implemented. Implementation of the alternatives would not change the conditions of the existing geological resources. Therefore, no impacts would occur.

137. The FLPMA [43 CFR 1702(j)] states the purpose of a withdrawal is to limit activities in order to maintain other public values or to reserve the area for a particular public purpose or program. Minimizing public safety risks from military training and testing activities requires reserving McGregor Range from settlement, sale, location, or entry. It is incumbent upon the federal government to control public access to hazardous areas through withdrawal or transfer.

138. The Army water rights on the Sacramento River and Carrisa Springs pertain to the diversions for the McGregor Range pipeline systems, primarily for livestock, although the stated use is for preservation of wildlife. This system, originally constructed by ranchers, has been in place since the turn of the century, and, in all probability, will continue to be tied to McGregor Range, which is what the LEIS says here. However, any decisions or determinations regarding those rights will be up to the New Mexico State Engineer, not the military; nor is it the intent of the LEIS to suggest to the BLM how to conduct their business. We are not aware of any "additional stockpiled military water rights... not within McGregor Range," nor was any reference to such found in the State Engineer's files. No revisions to the text are necessary.

139. A more detailed discussion of the extent and types of cultural resources on McGregor Range is presented in Section 3.9 and Appendix E. In accordance with the *National Historic Preservation Act (NHPA)* and common practices to protect these resources, a map summarizing their location has not been provided.

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140. The Army cantonment facilities have been concentrated at Fort Bliss proper and the three range camps: McGregor, Doña Ana, and Orogrande which is in the north of the Doña Ana Range–North Training Areas. While principally for supporting troops when they undergo field training, these camps have a small cadre of personnel stationed at them. All three of these range camps are in New Mexico. Section 3.5 discusses the probable level of energy resources on McGregor Range. The employment of the mining sector (including oils and gas) is presented in Table 3.10-4 while the earnings of this sector are shown in Table 3.10-7. The secondary employment attributable to this sector of the three-county economy is also presented in Table 3.10-6.
141. It is not known that the impacts would be significant. Therefore, no revisions to the text are necessary.
142. As stated in Section 2.2, 2.3, and 2.4, the Secretary of the Army would prepare a written determination concerning the contamination of the returned lands with explosive, toxic, or other hazardous substances. The Secretary of the Interior, in consultation with the Secretary of the Army, would decide what decontamination, if necessary, is economically feasible given different potential future use and relative risk. Alternatively, the Secretary of the Interior could decide not to accept certain areas due to future liability, thereby necessitating transfer to the Army. Cost analyses of clean-up are not typically part of the NEPA process.
143. The noise impacts resulting from the approved USAF tactical target complex and the possible helicopter training range are discussed in Section 4.12.1. The land use compatibility guidelines are set for human activities. The guidelines were issued by the Federal Interagency Committee on Noise (FICON), which is composed of representatives from the DoD, U.S. Department of Transportation (DOT), U.S. Department of Housing and Urban Development (HUD), EPA, and the Veterans Administration. A brief discussion of land use compatibility is presented in Appendix F, Section F.1.3.

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143
Cont.

guidelines set for human activities or wildlife activities?

144

ES-11/25
Scheduling prevents incompatible range-use conflicts. This statement should be true for all uses of McGregor Range (including Oil and Gas Exploratory and Production type activities), in areas where dismantled maneuvers can be conducted.

145

ES-11/30-31
Alternative 5. Ground and explosive safety risks will remain low. Low is not the same as non-existent. Is the Army going to reclaim all of the acreage or not, under this alternative.

146

ES-11/38-40
Do Army procedures and applicable hazardous material laws and regulations differ?

147

ES-11/44-45
The Army does use hazardous chemicals, but there is no statement here as whether they use hazardous chemical weapons at McGregor Range.

148

ES-12/3-9
Principal Military mission at McGregor Range is air defense, weapons, and equipment operation and training. McGregor is an Army base and shouldn't be used for basic Air Force training. No mention here of giving a portion of the Range to the Air Force for a new target complex for their training.

149

ES-12/3-25 Conceptual forces (Army force XXI and Army after next) should be explained or dropped from text?

150

Figure ES-1 Table ES-1
It is hard to believe that On-Road Vehicle Maneuvers, Control Access FTX sites and use, and Dismounted Training would be up to 100% affected by alternatives 2-6. On-road vehicular and dismantled maneuvers could easily be conducted with permits and scheduling, and the Army should be able to permit an FTX site just like the Oil and Gas industry would permit a drilling pad or location. Does the Military already know that the BLM will not permit such activities, or are they just reluctant to be in position where they're at the whims and time delays of another government agency?

151

ES-14/6-7
1990 MOU implements a means to support environmental preservation and maintenance operations to the degree funding for the appropriate agency allows. The Army is making projections for greatly increased activity and therefore funding levels at McGregor Range continuing over a 50-year period. How accurate can this be given the USA political system and Budget projections?

152

Section 1.0
There is no map in this section or Section 2 similar to 2.1.2 showing current use of the Range for comparison purposes in relation to proposed/projected usage (Alternative 1) or usage under the various Alternatives. (Figure 2.1.2 shows potential, at least 1 potential new target surface danger zone)

Section 2.0

153

2-10&11
Tables 2.1-2&3 Level of Military Use Criteria and Training Category(s) by Training Area. There is nothing like putting vague and misleading numbers to work!!! The table contains 28 Training Areas with Current Average Level of Use and Projected Training Level of Use. Putting numbers to the levels as in Table 2.1-2, the proposed and projected level of use for McGregor Range is expected to increase by 38% and be

144. Your comment was considered during preparation of the final LEIS and has become a part of this public comment response document for congressional review.

145. The Army has an on-going evaluation of the ordnance and explosive hazards on McGregor Range, and will continue with studies and pursue clean-up actions to the extent resources are available. Potential hazards to public safety associated with the granting of public access in portions of McGregor Range, such as in the Tularosa Basin, may preclude return of this area to the public domain, necessitating transfer of that land to the Secretary of the Army for future clean-up. The text will be modified to reflect this circumstance.

146. The Army complies with all federal, state, and local hazardous materials laws and regulations. In some instances, Army procedures are more conservative than the federal, state, or local regulations.

147. The types and uses of hazardous chemicals used on McGregor Range are discussed in Section 3.14.1. McGregor Range is not used for the testing or training of chemical munitions.

148. The principal military mission on McGregor Range is training. Air defense training conducted at McGregor Range is essential to the nation's security. Portions of McGregor Range, such as the Class C Bombing Range, are currently used for other service training. The use of the USAF tactical target complex on Otero Mesa is discussed in Section 2.1.1 and shown on Figure 2.1-1.

149. Explanations were added to Section 1.2 and the glossary.

150. The FLPMA [43 CFR 1702(j)] states the purpose of a withdrawal is to limit activities in order to maintain other public values or to reserve the area for a particular public purpose or program. Minimizing public safety risks from military training and testing activities requires reserving

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150. Continued

McGregor Range from settlement, sale, location, or entry. It is incumbent upon the federal government to control public access to hazardous areas through withdrawal or transfer.

Military activities in the Lincoln National Forest were described in the Army's EIS for the Land Use Withdrawal, McGregor Range Fort Bliss, Texas, August 1977. Present military activities are described in the draft *Fort Bliss Mission and Master Plan PEIS*, July 1998.

151. The Army employs various planning cycles for different aspects of its mission. For example, the Army uses a 6-year programming cycle for operational activities with facility planning over a 20-year horizon. Doctrinal and equipment life cycle planning can extend over a period of 40 years or more. The proposed 50-year withdrawal period encompasses each of these periods and enables long-term national security plans to rely on a stable land resource.

Reasonable capabilities of McGregor Range to support requirements for future training were described in Alternative 1. The capabilities to support the possible future activities other than those with completed or on-going NEPA documentation shown on Table 2.1-4 may or may not become actual missions performed on McGregor Range and are not projected as such. They are discussed in consideration of the Army's long-range planning objectives and full disclosure of these potential uses of withdrawn land.

152. Under Alternative 1, the withdrawal of McGregor Range would be renewed under the same conditions as provided in PL 99-606. The boundaries of the range would remain the same, as would current and projected activities. Figure 2.1-2 represents existing target flight areas and SDZs as well as the SDZ required to use a tactical ballistic missile as a target for Patriot training, should the Army propose do so in the future. Figure 2.1-1 illustrates the military land use potential

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152. Continued

for each training area on McGregor Range. This potential is consistent throughout each alternative as the action and alternatives evaluated relate to the withdrawal configuration.

153. The potential use is based upon the capabilities of McGregor Range. The uses considered are conceptual and may or may not occur, dependent upon the needs of the Army in the future.

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sustained for 50 years. I guess we expect to be fighting or policing more conflicts than current levels, or consolidating our troops at Ft Bliss. If this is the case the Army needs to permanently withdraw and solely manage this land with no BLM restrictions or oversight.

154

2-12
 Table 2.1-4 Future Activities on McGregor Range—in progress, Geothermal Resource exploration in Southern McGregor Range. **The Army at Ft. Bliss is already in the energy exploration business**, drilling test holes, conducting geophysical surveys, and planning to set up energy production facilities. It looks like the Army is doing, or going to do, everything that they don't want a private O&G business to do. What happens if the Army finds natural gas, CO2 or liquid hydrocarbons? Is a national government owned oil company formed? Methane is stable at temperatures of greater than 500 degrees. Geothermal Resources and part of the reservoir at Bennett Ranch (a Tertiary Syenite Sill) both owe their origins to igneous activity. Finding the two together may not be that unlikely. Also, why not set up a wind farm for electrical generation as well? The Rim of Otero Mesa should be an excellent place for the army to set up wind turbines to take advantage of the moderately strong sustained winds that buffet the area.

155

2-13/39-46
 Oil and gas operations and other extractive operations are not mentioned in this section, but grazing will continue on 271,000 acres of withdrawn lands, of which, about 100,000 acres of that are available currently for Oil and Gas leasing. Why the omission and disparity? **Oil and Gas operations require similar man-hours of maintenance activity and have been conducted and have coexisted with the military for many years at Ft. Chaffee in Arkansas.**

156

2-34
 Table 2.71 Comparison of Alternatives by Resource and Potential Impacts
 Alternative 1 Column
 Military use of McGregor Range is projected to increase dramatically, as stated above by the Army, yet none of the comparison items reflect this. Alternative 1 is not continued military use, but projected increased military use. As proposed, some of these impacts, although possibly slight in nature, should read:

- Decrease in non-military land uses
- Increased noise
- Increased road closures and delays
- Greater visual impairment
- Increased aircraft detours
- Increased utility consumption
- Increased waste generation
- Increased soil erosion and ground disturbance
- Increased water consumption
- Increased explosive safety risk
- Increased eventual reclamation cost

157

2-36
 Table 2.7-1 Comparison of Alternatives by Resource and Potential Impacts
 Earth Resources
 A continued erroneous assumption that Oil and Gas operations and mineral leasing are not compatible in any manner on all lands not currently designated by RMPA for Alternative 1 (~100,000 Acres only)

158

2-37
 Table 2.7-1 Comparison of Alternatives by Resource and Potential Impacts
 Socioeconomics:
 No change or only minor change in socioeconomic effects is reported from increased or decreased military employment and purchases even if nearly all of McGregor Range is returned to the Public. Why should anyone in New Mexico be in favor of continued use based on economics? No changes are noted for any non-military activities (Oil and Gas Operations, Extractive Minerals Production, Grazing, Geothermal, Wind Farm Energy Production and Contracted Reclamation of Military Missile and Bombing

154. Geothermal resources in southern McGregor Range are being explored, and installation of a geothermal binary generation and desalination plant is under consideration as an alternative energy source for the installation under the Army's geothermal energy program. It is also being considered as a potential source of water for the McGregor Range Camp following desalination.

155. The following text has been added to Section 2.1.2, "Should oil and gas exploration occur on McGregor Range lands that are available for oil and gas leasing, the activities would be managed by the BLM in accordance with the White Sands RMP (BLM, 1986a)."

156. This table presents the results of the impact analyses that were conducted for each resource and alternative. No change to the text is required. Your comment was considered during preparation of the final EIS.

157. Oil and gas operations on designated areas of McGregor Range are managed by the BLM in accordance with the White Sands RMP.

158. The analyses of the socioeconomic impacts of the alternatives indicate that Alternatives 1 through 4 would not have an economic impact on the area because military employment and purchases would not change significantly. Under Alternative 5, there would be a minor impact due to reduced military employment and purchases.

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Ranges) which might take place on the Range after the area has contracted. These changes could be very significant.

159

3.0
Affected Environment (Baseline 1996)
A second Baseline for Environment issue should be pre-McGregor Range. Early low-level photography and pre-WWII documents should be used to establish this longer-term look at Affected Environment.

160

3.1 Land Use
3.1-1/40-41
Army has annual rights to (and diverts) about 110,000 gpd of water from the Sacramento River and Carrizo Springs for preservation of fish and wildlife. The U. S. Army should not be creating unnatural habitat anywhere. Is it in the fish farming business? Is it running a Game Preserve for profit?

161

3.1-2/9-14
Rights-of-way, such as would be needed for Oil and Gas Operations, have been granted in the past, and currently exist in areas off-limits to extractive operations. Approval of ROW's therefore, should not be a significant problem in most areas.

162

3.1-4/47-48
FTX areas have undergone environmental evaluation and clearance. There is no mention here of any archeological surveying. Why not? Are these sites disturbed to the point where they need to be re-seeded with the proscribed BLM plant mixture?

163

3.1-5
Figure 3.1-1
Why is the buffer zone to the USAF Tactical Target Complex so huge in comparison to the McGregor Class C Bombing Range (which has no buffer zone marked at all on the map)?

The Army is projecting a large increase in oversized (greater than 0.4 sq. mi.) FTX sites on Otero Mesa and along Highway 54. Why? No explanation is with the figure.

164

3.1-6/32
ROW's are not required for infrastructure constructed by the Army within McGregor Range. Does this mean the Army has exempted itself from having to conduct archeological surveys and environmental assessments as required by BLM operations elsewhere? Why?

165

3.1-7/20 - 3.1-11/48
The U. S. Army and Bureau of Land Management are in the Livestock Business as detailed here. This should be left solely to the local ranchers or the area should be completely withdrawn. Do the out-of-state grazing contractor put their animals in quarantine to reduce the risk of non-native plant species introduction or weed wash the hauling trailers.

166

3.1-11/50 - 3.1-12/1
Diverting water to wildlife via a pipeline system that diverts water from the Sacramento River is not ensuring the natural abundance and diversity of wildlife.

167

3.1-13/38 - 3.1-14/10
Special Management Areas
ACEC's and WSA's should be very temporary designations limited by a set time frame. The ARMY/BLM should be required to get these areas approved as Wilderness Areas, National Grasslands or other such legislatively approved designations.

168

3.1-19/35 - 3.1-20/3
General statements about the viability of livestock operations (not needed), all lead to the observation

159. The NEPA process for the LEIS analyzes the environmental impacts to the existing environment resulting from implementation of the current withdrawal configuration and alternatives to the amount of land withdrawn. The environment has already been altered from its original or pre-McGregor Range state. The description of the existing environment represents the cumulative effects from all actions, natural and man-made up until 1996.

160. The Army water rights on the Sacramento River and Carrisa Springs pertain to the diversions for preservation of fish and wildlife and additionally is used to support livestock grazing. The McGregor Range pipeline system, originally constructed by ranchers, has been in place since the turn of the century, and is used to support natural resource management responsibilities of the Army and the natural resource and nonmilitary activity management responsibilities of the BLM as specified in the 1990 MOU between the two agencies.

161. The referenced section describes existing rights-of-way (ROWs). Access and ROWs are further described along with the existing procedures affecting energy and mineral development may be found in Section 3.1.2.2. Should oil and gas operations occur in the future, they would be managed by the BLM subject to the Army's concern for the compatibility of military missions and public safety.

162. The environmental evaluation and clearance process includes the conduct of archeological surveys. Roving Sands FTX sites are rotated to minimize the disturbance to areas and to prevent the disturbance of the area to a point that it is unable to recover naturally.

163. The buffer zone to the USAF tactical target complex is required to ensure safety during the use of inert/subscale munitions whereas only inert munitions are used on the McGregor Class C Bombing Range.

The potential increase in the number of FTX sites on Otero Mesa and along U.S. Highway 54 is discussed in Section

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163. Continued

2.1.1 and Table 2.1-4. Figure 2.1-4 illustrates the areas on McGregor Range that meet the physical and operational requirements for controlled access FTX sites.

164. Although ROWs are not required for infrastructure constructed by the Army on McGregor Range, the Army must comply with NEPA and other environmental regulations that require environmental assessments and studies.

165. Grazing on McGregor Range is managed by the BLM. BLM procedures that affect grazing on McGregor Range may be found in the McGregor Range RMPA (BLM, 1990).

166. Your comment was considered during preparation of the final LEIS.

167. Your comment was considered during preparation of the final LEIS.

168. Your comment was considered during preparation of the final LEIS.

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168
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that small (mom & pop) ranching operations are not economic. It appears the U.S. Government wants each family unit today to work 2 jobs in the city/metroplex to get by, leaving the range land for big business or the environmentalists.

169

3.1-20/5-12
 Minerals

The statements "Some oil and gas potential exists in Otero County." and "These reserves may become more economically viable for production, depending on market conditions" need to be reworded, and expanded. Why is there not more detail here about past mining in the Jarilla Mountains, quarrying, and recent Oil and Gas activities in Otero County and the surrounding geological province (ROI)? For an evaluation covering the next 50 yrs. this information is important. (See attachment 3)

.24,960.00	acres under NM Federal Leases
7000,480.00	acres under suspended Federal Leases
166,080.00	acres under NM State Lease
84,480.00	acres unleased State Leases
6,351.49	acres under Fee Leases (N.M.)
440,640.00	acres under TX ULS Leases
400	line miles of 2D seismic shot in TX
5	line miles of 2D seismic shot in NM
540	line miles of 2D seismic proposed in NM
25	square miles of 3D seismic proposed in NM
1	well drilled in TX
1	discovery well drilled in NM with additional wells delayed by BLM procedures and low product pricing.
\$7,000,000.00	Estimated Industry expenditures in the area (ROI) since 1996.

170

3.1-22/32-41 Aesthetics and Visual Resources

Are all buildings on Federal Land painted with the recommended BLM color to match the environment?

171

3.4 Utilities

3.4-1/8-Water Supply

Water Supply details are given here about pipelines, delivery capacities and water use. Do each of the major water pipelines have an established ROW? Have archeological surveys been done?

172

3.4-2/14-Wastewater Treatment

Are the wastewater ponds on McGregor Range netted to protect migratory and resident birds? During July-September brief, heavy rainstorms frequently cause localized flooding. Are the Army installations at McGregor Range all in compliance with storm water waste run-off statues?

173

3.4-2/45 Energy

A gas transmission pipeline (2") with distribution system is already in place at McGregor Range Camp similar to that which any Oil and Gas Operation would need to build.

174

3.4-3/1-9

Commercial telephone services originate off Range. Is there an existing buried or above ground ROW? Do DSN trunk lines and any newly-constructed fiber optic cables have an approved ROW (Arch'd and ES).

175

3.5 Earth Resources

3.5-2

Figure 3.5-1 Mineral and Energy Resources in the McGregor Range Area of Texas and New Mexico need better research. Many oil and gas wells are missing in Texas. Numerous water-test wells are missing from the recognized geothermal area.

169. The text in the *Land Use* section was modified to add a cross reference as follows: "Additional information regarding mineral and energy resources is provided in Section 3.5, *Earth Resources*, and Appendix C."

170. The referenced section is describing the feature categories of aesthetic and visual resources. A description of the existing aesthetics and visual resources is presented in Section 3.1.5.1 and 3.1.5.2. All the buildings are not painted a specific color, but rather are maintained to fit the cultural landscape and remain as unobtrusive as is practical.

171. The McGregor Range pipelines date from the early 1900s, prior to requirements for ROWs and archeological surveys. However, about 30 percent of the range has been surveyed for cultural resources as discussed in Section 3.9.

172. The sewage treatment lagoons on McGregor Range are not netted to protect birds. In fact, the lagoon at McGregor Range Camp has become a miniature wildlife refuge, abounding in birds. Range facilities are in compliance.

173. Your comment was considered during preparation of the final EIS and has become a part of this public comment response document for congressional review.

174. However, as stated in Section 3.1.2.2, ROWs are not required for infrastructure constructed by the Army within McGregor Range, such as telephone or utility distribution lines. Yes, ROWs are granted for commercial telephone or utility lines originating off-range that enter onto the range.

175. Four wells in Texas, 6 to 10 miles from the McGregor Range boundary, were not included on the figure. Since completion of the Draft LEIS, the geothermal test wells have been located by the Global Positioning System (GPS). The wells will be added to Fig. 3.5-1.

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176

3.5-3
Table 3.5-1. Mining Districts in the Vicinity of McGregor Range
This listing of mining districts with descriptions gives some production values. Are these referenced in current dollars? Are there any reserve figures to go along with the production values you have quoted?

177

3.5-4/45
Oil and Gas
The Army lists the important factors for an area to have commercial oil and gas production: the presence and volume of source rocks; the degree of maturation of the source rocks; the availability of reservoir rocks; and the availability of stratigraphic or structural features to trap the migrating oil and gas, but goes on with practically no detail about each of these factors. The NM Bureau of Mines and Mineral Resources has provided the Army with information concerning the presence and maturation of source rocks on the Range. This information should be combined with lab geochemistry to get hydrocarbon yields and an estimate of the amount of hydrocarbons that could be or have been generated in the area.

178

3.5-9/1
Tularosa Basin should not be used here in reference to Paleozoic rocks. The proper term is Orogrande Basin. The Tularosa Basin refers to a Tertiary age fault-bounded valley, which only somewhat coincides with the older geology.

179

3.5-9/2
To the oil and gas industry the number of wells drilled in the Tularosa valley would hardly be called numerous. No statements are made here about the actual number of wells drilled or well density. No statements are made concerning the dates many of these were drilled and the level of petroleum technology that existed at that time. Many dry or non-commercial wells have been drilled in other basins or plays (such as the Rocky Mountain Overthrust Belt) before an initial discovery changed thinking and opened up a large producing province.

180

3.5-9/16-18
The statement presented here is misleading; the Otero Mesa-Diablo Plateau is not entirely underlain by the flanks and core of the Pedernal Uplift and source rocks are abundant in some areas.

181

3.5-9/20-26
Statements presented here are probably correct in an overall vague sense. Large pre-Tertiary single reservoir hydrocarbon traps would have poor preservation due to Tertiary destructive processes. However, smaller traps such as fluvial-deltaic sandstones and carbonate phylloid algal mounds could easily be intact. Those same destructive processes could have also created secondary migration traps, new reservoirs such as igneous sills, or jumpstarted the hydrocarbon source rocks ("the kitchen") into generating oil and natural gas. Hydrocarbons do exist in similar settings to the Tularosa Valley (Railroad Valley, Nevada) and Otero Mesa. The commercial gas discovery at Bennett Ranch and new technology may just now be leading the industry into opening up many new fields in the Orogrande Basin. As for the size ranges given by the Army here, this is just speculation. Will there only ever be one commercial gas well in the Basin? It could be equally likely that quite a few 1-10 MMBO/10-60BCFG fields could exist under McGregor Range.

182

3.8-11/1 Hueco Mountains
Why is there no Raptor paragraph here as with the other areas?

183

3.9-3/23 Historic Architectural Resources
There is no listing here for the 21 historic resources mentioned. Is the 100-yr. old water pipeline and earthen dam system on Otero Mesa considered part of these resources?

4.1-2/29

176. The production values in the table are shown in actual dollars, a common practice, rather than in current dollars. Reserve figures were not available.

177. Collection and analysis of data as recommended are beyond the scope of the LEIS and the *Mineral and Energy Resource Assessment* (U.S. Army, 1998g), prepared by Mariah and Associates and the New Mexico Bureau of Mines and Mineral Resources, for the application to renew the McGregor Range land withdrawal.

178. The comment is technically correct, but the use of "Tularosa Basin" is not incorrect. The Tularosa Basin (or Tularosa Valley) is a formally recognized geographic feature having surface expression, in addition to being a geologic structural feature. The Orogrande basin is not recognized as a geographic feature, although it is a geologic structural feature. In order not to confuse a mostly nontechnical audience, "Tularosa Basin" will be retained as a geographic location, but the sentence will be reworded to read, "Paleozoic source and reservoir rocks underlie the Tularosa Basin...."

179. "Numerous...wells" will be replaced with "several." The information on oil and gas exploration in the Tularosa Basin in the LEIS is a general summary and does not go into specific detail. The information was obtained from the most recent appraisals available.

180. The comment is unclear. The referenced statement neither says nor infers that the Otero Mesa-Diablo Plateau is entirely underlain by the flanks and core of the Pedernal uplift. As for the abundance of source rocks, there does appear to be disagreement in opinion between LEIS sources (Black, 1975; King and Harder, 1985) and the reviewer.

181. The comment is valid for the referenced part of the paragraph; however the second half of the paragraph does acknowledge the possible presence of smaller reservoirs and the optimism generated by recent exploration.

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182. A discussion of raptors in the Hueco Mountains has been added to the text.

183. Most of the 21 historic resources are identified and discussed in Appendix E, *Cultural Resources*, of the LEIS. The water pipelines and dirt tanks on McGregor Range probably are not considered historical architectural resources because the original pipelines have been rebuilt and expanded several times. Some of the older tanks may still exist in their original form, although most have been rebuilt or are destroyed.

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184 The Otero County Comprehensive Land Use Policy Plan mentioned here is of what status and importance? Will it be adopted? When?

185 4.5-5/45-
Earth Resources at the USAF tactical target complex on Otero Mesa will be significantly impacted. This is not stressed enough anywhere in the text. The Military will be sculpting the land with blades and bulldozers before bombing, strafing and exploding the relatively virgin 8+ sq. mi. area.

186 4.5-8/39-40
A general statement is given here that as the amount of restricted land increases so does the adverse impact to the availability of energy and mineral resources. The Orogrande Basin encompasses roughly 11,000 sq. miles in southern New Mexico and far West Texas. Over 4,000 sq. miles of those same acres are currently restricted to any kind of oil and gas exploration by the Federal government. If the U.S.A. wants to maintain a domestic hydrocarbon industry and production over the next 50 years areas like McGregor Range must be opened up and investigated.

187 The above comments are HEYCO's abbreviated thoughts on the Draft McGregor Range LEIS, due to the fact HEYCO received the draft document on October 26, 1998 and had approximately 68 business days (106 total days less 30 days made up of weekends and an estimated 8 days for Thanksgiving, Christmas and New Years holidays) between the date of receipt and February 9, 1999 to review over 600+ pages of information that surely took the staff of McGregor Range several years to compile. This time frame is not sufficient for an independent oil and gas producer with limited staff, such as HEYCO, to give sufficient and comprehensive comments to such an important issue as the McGregor Range Renewal. HEYCO would have certainly appreciated more sufficient time for its staff to make personal visits to Fort Bliss to gain knowledge of critical information needed to use toward its review of the Draft LEIS, as well as the time needed to research public information for all aspects of McGregor Range and Otero County in general. There are several documents mentioned in the Draft LEIS that are not included in the Draft and are not available to industry without a trip to Fort Bliss, Texas. In any event, HEYCO will be anxiously waiting for the Final LEIS to arrive. Thank you for your cooperation and immediate attention to this response. If you have any questions concerning this response, please call Steve Yates, Vice President, Gordon Yahney, Geologist, or me at 505/623-6601.

Very truly yours,


Vernon D. Dyer, CPL #3174
Land Manager

GKY:VDD/dlm
Enclosures

McGregorLeis.doc/A.orogrande

184. This first *Draft Otero County Comprehensive Plan* (March 1998) is currently being reviewed by the State of New Mexico. Following approval by the State, the Plan will be finalized by the county planning commission and the citizen working group. Then the County Commission will vote on adopting the Plan. Once adopted, the Plan would reflect the county's official policy and recommended use of lands within its boundary (excluding municipalities). The Plan would provide a basis for evaluating the effects of proposed activities on the public lands relative to the county's goals for land use and development. Public lands would continue to be managed by their appropriate state and federal land managers in accordance with all applicable land management and environmental laws.

185. The potential environmental impacts resulting from the USAF tactical target complex on Otero Mesa are summarized in Section 4.5.1.2. More detailed evaluation is presented in the *Final EIS, Proposed Expansion of German Air Force Operations at HAFB, New Mexico*.

186. Thank you for your comment.

187. The NEPA requires a 45-day minimum comment period for a Draft EIS.

188. Several of the documents referenced in the LEIS such as the *Mineral and Energy Resource Assessment of the McGregor Range* (U.S. Army, 1998g), the *McGregor Range Water Requirements and Resources Assessment* (U.S. Army, 1998f), the *McGregor Range Land Use Study* (U. S. Army, 1998e), the *McGregor Range Economic Report* (U.S. Army, 1998m), the *Fort Bliss TADC* (U.S. Army, 1998d), the *Fort Bliss INRMP* (U.S. Army, 1998b), the *Fort Bliss ICRMP* (U.S. Army, 1998c), and the *Fort Bliss Mission and Master Plan PEIS* (U.S. Army, 1998a), were provided to the following libraries: El Paso Public Library; Irving Schwartz Public Library; Westside Branch Library; Branigan Memorial Library; Dell City Library; Alamogordo Library; New Mexico

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188. Continued

State University, Bramson Library; New Mexico State University, Roswell Library; University of Texas at El Paso Library; Cloudcroft Library. In addition, other documents referenced in the LEIS have been provided to various area libraries by the agencies that prepared them such as the USAF.