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VELMA B. JOHNSTON, "Wild Horse Annie"

WILD HORSE ORGANIZED ASSISTANCE INC.

A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

8-22-79
P. O. Box 333
Reno, Nevada 89504
Telephone 325-3968
Area Code 702

August 22, 1979

Mr. E. F. Spang, Director
Bureau of Land Management
Room 3008, Federal Building
300 Booth Street
Reno, Nevada 89509

Dear Mr. Spang:

Thank you very much for your request to comment on the DEIS on the withdrawal of public lands for the Nellis Air Force Bombing Range. We can only comment on the portion of the North Range known as the Nevada Wild Horse Refuge, which supports a substantial number of wild free-roaming horses. Up to the present we have generally supportive of the continued withdrawal for several reasons, one being the safety of the animals. However, the DEIS proposal seemingly implies an overall expansion of testing without identifying the negative impacts on wild horses. The DEIS fails to produce any programs of enlightenment (research), the alternatives where the impacts could be minimized for these particular animals.

Our concerns are:

1. Pollutants impact on
 - a. ground cover
 - b. water
 - c. vegetation
2. Construction
 - a. migration-immigration
 - b. obtaining cover, food and water*

* stress caused from excessive heat, and lack of water caused deaths of 50 odd horses at Dugway Proving Grounds June-July, 1976.

3. Radioactivity levels
 - a. safe level for horses
 - b. water
 - c. vegetation
4. Vegetation impacts on the 7600 acres
 - a. alternative source
 - b. loss in terms of AUMs for horses



5. Noise level

a. stress after additional sorties are instituted

The Air Force and the Bureau has had ample time since the establishment of the agreement in 1962, 1965 respectively to determine levels of stress, toxicity, migration patterns in relationship to the activities on the bombing range. Since none of these were listed, suggested or implied we must reply to the negative to the DEIS. We query why some alternatives were not suggested or those that were not explained in detail.

1. Do pollutants(dust, radioactivity, etc.) permeate water and forage supplies? If so, what are the acceptable levels safe for wild horses? Would it be possible to seed other areas away from contaminated sites?
2. What disruption would be caused by construction? Is it possible to do this during seasons of use by the horses?
3. If effects are unknown of electromagnetic radiation, why are studies not suggested to identify those levels? Surely this information would also benefit mankind.
4. Noise levels at the present seemingly are not disruptive, what happens when an additional 5,000 sorties are instituted? If the agencies do not plan on studies, who and how will this level of stress be determined?

The primary motivations being economic, political, and ideological, all of which exist on the level of awareness. It is the awareness and consciousness that must be elevated; if the mistrust is to be reversed. Factors compounding the situation are seen daily in the news media...relating to some 'untold' story that will and does affect human lives everyday. Perhaps it is conceivable that the Refuge is no longer suitable as a refuge if increased activity denies the protection offered--but instead a hideous prison from which there is no escape. We cannot accept the DEIS as identifying the impacts on wild horses and as responsible government employees, the Bureau should not. The Bureau cannot possibly uphold its responsibilities without knowing what the proposal will do to those horses.

Most sincerely,

Dawn Y. Lappin (Mrs.)
Director

*Nearly one full year after the questionable deaths of 50 odd horses at Dugway Proving Grounds, it was disclosed that testing had been responsible for the deaths of over 6,000 sheep in 1968. One month later an entire band of wild horses were auctioned to the public from Dugway Proving Grounds.

8/21/79

W H O A !

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In Memoriam

LOUISE C. HARRISON
VELMA B. JOHNSTON, "Wild Horse Annie"

August 21, 1979

Mr. E. F. Spang, Director
Bureau of Land Management
Room 3008, Federal Building
300 Booth Street
Reno, Nevada 89509

Dear Mr. Spang:

Thank you very much for your request to comment on the DEIS for withdrawal of public lands for Nellis Air Force Bombing Range. We can only comment on those impacts as they relate to the wild free-roaming horses within the Nevada Wild Horse Refuge portion of the North Range. Under the joint agreement that portion supports a substantial number of wild free-roaming horses, relatively safe from harassment and capture. Generally we have been supportive of the continued withdrawal for military purposes, they preclude habitation, and the cost of relocation would be prohibitive. However, we do have major concerns not only for the DEIS, but for past performances of the military and the agency as they relate to the wild horses.

The DEIS fails to identify the negative impacts of the approximately eight target areas present in addition to the proposed fifty-three (sub range 71-74); the three burial sites (1-19, contents unknown); and the more than one contaminated site within the vicinity (Project 57 and Clean Slate 1-2-3-). Although sufficient time has elapsed since the establishment of the Refuge in 1962, neither the military or the agency has seen fit to research those impacts of the above, the noise, or the electromagnetic radiation. The draft did recognize the negative impact on the proposed 7600 additional acres; but failed to provide alternatives to those animals restricted to the Refuge who cannot seek refuge elsewhere. The conversion of even 30 acres per aum would mean substantial losses of forage in an already depressed area; but no alternative was proposed--such as seeding in other areas. Major pollutants were recognized and precautions taken for lethal affects on humans--but again, no alternatives or precautions were noted for the primary habitat requirements for the wild horses, food and water.

Existing roads, 315 miles to be up-graded, and additional 60 miles of new roads developed, the impacts to the wild horses are substantial. Will this alter migration, will additional fencing be necessary, and will it disrupt normal routes to water and forage? Admittedly the DEIS recognizes extensive contamination of the range will no doubt affect currently available vegetative and water resource; so what is the alternative? Will the development of the 31,000 gallon well reduce the water table, affect other springs or seeps? Again, no alternative.



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5. Noise level

- a. stress level after additional sorties are instituted

Our comments then are:

The Air Force and the Bureau have had sufficient time since the establishment of the joint agreement in 1965 (1962, 1st agreement), to study the migration patterns- the affects of flight patterns; blood, tissue and fecal samples- to indicate levels of toxicity; the social structure, mating, foaling- to determine any alteration in behaviour. None of this is produced within the DEIS and failure to do so requires us to reply to the negative to the DEIS as being incomplete. We are curious why some alternatives were not suggested, or perhaps explained in more detail.

1. Do pollutants (dust, radioactivity, etc.) permeate water and forage supplies? If so, what are the acceptable levels? Would it be possible to seed in other areas away from target or contaminated areas?
2. What disruption would be caused by construction and up-grading of roads, the designing of bombing patterns, etc.? Is it possible to do this at particular seasons of the year when perhaps the horses are in other areas? Will additional fencing be required in this construction?
3. If effects of electromagnetic radiation are unknown, why are not studies proposed to identify those levels? Surely information of this kind could benefit mankind as well. Perhaps it is conceivable that with increased activity by the military the refuge is no longer feasible as a refuge.
4. Noise levels at the present do not seem to be disturbing the animals, but what of the additional 5,000 sorties proposed? How will the agencies determine stress if studies are not initiated?

It is unfortunate the growing level of distrust by Westerners of governmental bodies of programs that were instituted for 'their own good.' Only to find that the programs were not what was intended. Factors compounding this situation are seen daily in the media: 1) man-power and funding, cut back 2) possible cancellation of MOU if testing increases 3) recentl disclosed contamination of areas within the four-corner states 4) MX missile site proposal. The primary motivations being economic, political or ideological, all of which exist on the level of awareness. It is this awareness or consciousness that must be raised. If the impacts cannot be identified and measures taken for minimizing those impacts, then the Refuge is not a refuge--but a hideous prison, from which there is no escape. The former two motivations may very well get the attention because they have a clear impact on the people, but the ideological must not be taken for granted as it has increased in its strength over the past generation. We do believe it possible for a strong defense and the environment to exist without one destroying the other. The Bureau must not abrogate its responsibility to the horses simply because we are told it is for our own good--that is for the public to decide.

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In light of the failure to produce those impacts and in addition to other factors within current memory, we conclude that it would be irresponsible for us to accept the draft as it is written. Nearly three decades of battling and experience with agencies has shown that programs are not always what they would seem, even if in the best interests.

*Nearly one full decade after passage of Pl 92-195 the fate of wild horses in the State of Nevada is uncertain.

*Man-power and funding not available to minimize negative impacts

*Dugway Proving Grounds-July 27, 1976-"stress, hot weather and water limitations led to the deaths of some 50 odd horses....." Yet, nearly one year later it was disclosed that testing on Dugway was responsible for similar deaths of 6,000 sheep in 1968.

*The possible cancellation of MOU (memorandum of understanding), thereby displacing the entire population, or eliminating it.

*Recently disclosed radioactive contamination of areas within the 'four-corner' states. Herein threatening the very population they are committed to protect--we are relatively sure that animals would fail to raise the consciousness of those who would risk human lives.

*The proposed MX missile site system location in Nevada....again usurping a natural population without minimizing the negative impacts on the population.

If the impacts cannot be identified then the Refuge is not a refuge--a haven for protection; but a hideous prison, one from which they cannot escape. We believe it possible to have a strong defense and national security in harmony with the environment. Those assurances help in the credibility of both agencies, Interior and Defense. The Bureau must not abrogate its responsibility simply because it is told it is in 'our best interests'.

Most sincerely,

Dawn Y. Lappin (Mrs.)
Director

*The Resource Conservation and Recovery Act of 1976 requires that creation of recordkeeping system to track wastes from the point of generation to their ultimate disposition, their storage, treatment, and disposal.