Call Valerie 1987

Erik Watkins
652-4288
Nellis

FONSI signed
no review period

TAC
Headquarters
Decided EA
not to be put out

<u>ENVIRONMENTAL ASSESSMENT</u>

IR-286 Altitude Revision Between Points D and F
and Alternate Exit GX

EA-88-39

1987

feeding season?
Burros yearround
~~[illegible]~~ feeding season
March 1 - June 30
policy statement
helicopter prohibited
6 weeks before
& 6 weeks after
anything under 500 ft.
restrictions

VM

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APPENDIX

AGL
Above Ground Level

1.0 PURPOSE AND NEED FOR THE ACTION

Military fighter aircraft tactics are a dynamic arena often requiring diverse training environments that may have to be revised and updated to accommodate modern sophisticated fighter aircraft capabilities. The purpose of the proposed action is to modify an existing Military Training Route (MTR), IR-286; to lower the flight level from 500 feet AGL to 100 feet AGL between Point D and Point F, modify alternate exit route GX (Appendix I and II), and increase flight operations on the MTR. The changes would provide training for various models of F-15 and F-16 aircraft employing Low-Altitude Navigational Tactical Infrared for Night (LANTIRN) equipment. The LANTIRN weapons system is a navigation and targeting system which provides high-resolution infrared imagery and precision targeting functions for high-speed, low altitude flight and air-to-ground weapons delivery over any terrain at night and/or with limited visibility.

Low level flight at night is necessary to test and evaluate new weapons systems and provide aircrew training under simulated combat conditions. Training at 100 feet AGL is necessary to properly test and train aircrews with LANTIRN equipment. Training at 500 feet AGL is not low enough to validate tactics at operational altitudes.

The Alternate exit Point GX change is necessary to provide clear access to the restricted airspace boundary, R-4807, at 100 feet AGL. Currently, the exit point stops at the TFWC Range Complex land boundary approximately six miles short of R-4807.

This EA is being completed to fulfill the administrative and regulative requirements of Air Force Regulations (AFR) 55-34, Reducing Flight Disturbances and AFR 19-2, Environmental Impact Analysis Process to ensure compliance with the prerequisites of the National Environmental Policy Act.

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 Proposed Action

The proposed action modifies a portion of IR-286 (See Appendices I and II) from Point D to Point F and consists of three actions:

1) Four additional F-16 daily sorties and four new F-15 daily sorties.

2) Lower the the flight altitude from 500 feet AGL to 100 feet AGL from Point D thru Point F.

3) Modify alternate exit Point GX by extending the length six miles between the following coordinates: 37°50.0' N 117°00.0' W.

The floor of the route would not change at all other points along IR-286. The ceiling along the route would remain at 9,000 MSL between Points D and E and 9,800 feet MSL between Points E and F. The proposed route width would not change. A complete narrative description and map of the route between Points D and F on IR-286 are contained in Appendix I and Appendix II.

2.2 Flight Operations for IR-286

The primary users of the route would be various F-15 and F-16 aircraft conducting operations at a groundspeed of 480 knots. Additional users would consist of the following types of aircraft on a normal basis at a groundspeed of 420 knots; A-7, F-111, and A-6. The aircraft with existing and proposed daily usage of IR-286 are shown in Table 1. The route would also be used on an occasional basis by A-10, F-117A and F-4 aircraft, and Navy F-14, A-7 and F-118 aircraft.

Table 1. Daily Sorties Activity on IR-286.

	EXISTING			PROPOSED		
Aircraft	Day	Night[1]	Total	Day	Night	Total
A-7	.5	.5	1	.5	.5	1
A-6	1	0	1	1	0	1
F-111	1	0	1	1	0	1
F-16	8	8	16	10	10	20
F-15	0	0	0	2	2	4
Total	10.5	8.5	19	14.5	12.5	27

[1]Night refers to flights between 10:00 PM and 7:00 AM.

Total use is expected not to exceed 27 sorties within a 24-hour period. Route use would normally be during weekdays approximately 260 days/year,

avoiding holidays. Aircraft would take approximately 12 minutes to fly the 78 miles contained in the change from Points D to F. Supersonic flight activity is neither authorized nor proposed along IR-286.

Special operating procedures would be established around the areas of Gold Point and Bullfrog Mine to avoid the areas by 3 NM or 1,500 ft AGL. This criteria is already established for the community of Beatty and is stated in the Flight Information Publication AP/1B.

2.3 No-Action Alternative

The no-action alternative would be not to change the existing route and the existing level of flight operations would continue (Table 1). The present level of 19 sorties within a 24-hour period would not be exceeded. Use would continue to occur approximately 260 days per year, avoiding weekends and holidays.

2.4 Alternative Considered but Not Carried Forward

Another alternative, to design a new low level route and to relocate the flight activities was considered, but not carried forward. This alternative was determined to not be reasonable because IR-286 can meet the requirements without significant changes or additional design costs.

2.5 Scope of the Environmental Review

The proposal includes changes to an existing Military Training Route, IR-286, located in southwest Nevada. The route is being used and will continue to be used for training aircrews flying various aircraft, of which some have LANTIRN capability. IR-286 has been used by fighter aircraft for low level training missions since December 1, 1977.

The proposal includes additional aircraft use. There will be four additional F-15 sorties and four more F-16 sorties per day. The route from Point D to Point F will be analyzed to assess noise impacts resulting from additional aircraft use as well as noise impacts resulting from changing the flight level from 500 feet AGL to 100 feet AGL. No supersonic flight has been authorized or proposed for IR-286.

Availability of airspace for night flying operations must be accessible to allow F-15 and F-16 aircraft to employ the LANTIRN weapons system. IR-286 will be used for testing and training aircrews and evaluating their ability to maintain a combat ready status. IR-286 will fulfill the airspace and operational requirements for F-15 and F-16 aircraft with these proposed modifications.

3.0 DESCRIPTION OF THE EXISTING ENVIRONMENT

3.1 Geography

The topographic features along the affected portion of IR-286 (Points D to F) are typical of the Great Basin. The route is within wide valleys between north-south trending mountain ranges. There are no lakes or rivers.

Elevations range from about 2,500 feet within the Amargosa Desert south of Beatty to about 4,000 feet on the desert floor within Sarcobatus Flat. The principal valleys utilized by IR-286 are Amargosa Desert, Sarcobatus Flat, and Clayton Valley. There are several hills over 7,000 feet and the route's highest ground point is Montezuma Peak at 8,373 feet east of Goldfield.

The slope of the terrain is generally 0 to 10% on the valley floors, increasing to 11 to 20% in the foothills. Slopes of 21% to greater than 45% are characteristic of the mountain ranges. The slopes and valleys are typified by bajadas bisected by washes, drainages and gullies which carry the infrequent rain water to playas on the desert floor.

3.2 Climate and Air Quality

Annual precipitation depends on elevation and varies from 4 inches in the valleys to 14 inches in the higher mountain elevations. The annual precipitation cycle displays a double maximum, with the primary in winter and secondary in the summer. Precipitation often falls as rain. Summer rains are associated with thunderstorms which are intense enough at times to produce local flash flooding.

The hottest months of the year are July and August with average monthly temperatures of about 90° F. Daily temperatures rise to 95° and drop to the 60's at night. The average monthly winter temperature falls to between 15°F and 45°F.

Air quality can be described as excellent and monitoring stations along IR-286 are not needed. The ambient air quality levels are well below the National Ambient Air Quality Standards (NAAQS). Air quality is not an issue with IR-286.

3.3 Vegetation

The predominant vegetation is typical of the Great Basin. The Southern Desert Shrub community is at the lowest elevations along the route and is composed of creosote bush, blackbush, bursage, boxthorn, Joshua tree, Mojave yucca, Spanish bayonet, prickley pear cactus, and tall Galleta. The salt desert shrub plant communities are found primarily in valley bottoms and include white sage, shadscale, Bailey's greasewood, and Galleta.

The northern desert shrub communities are found at the higher elevations along IR-286. The important plant species in this group include big sagebrush, rubber rabbitbrush, little green rabbitbrush, bitterbrush and Indian ricegrass.

The pinyon-juniper community is found above the northern desert shrub. Pinyon and Utah juniper trees can be found on the slopes of the mountain ranges along the route.

3.4 Animals

Mule deer could be found in the Montezuma Range, the foothills of the Palmetto Mountains and Gold Mountain. Bighorn sheep do not exist along the route. Slate Ridge and Gold Mountain areas are designated by Nevada Department of Wildlife (NDOW) for "Potential Distribution." Coyotes, bobcats, foxes, badgers and mountain lions inhabit the areas along the route. Small mammals such as antelope ground squirrels, kangaroo rats, mice, cottontail rabbits and jack rabbits are widely distributed.

Several species of hawks are represented, with the redtailed and marsh hawks and Kestrels being the most common. Wintering golden eagles and occasional bald eagles are also found.

IR-286 passes over portions of wild horse and burro areas. Twelve wild horses and 218 burros are found in the Bullfrog Wild Horse and Burro Herd Management Area. Wild horses are also found in the Montezuma Peak (161), Palmetto (184) and Gold Mountain (19) Wild Horse Herd Management Areas.

No specific inventory for endangered and threatened animal species under the existing or proposed route has been completed. However, no federally listed endangered or threatened wildlife species have been documented along IR-286. The desert tortoise is considered a rare species by NDOW and inhabits areas near Beatty under the route.

IR-286 passes over portions of three cattle allotments administered by the Bureau of Land Management: Montezuma (538,297 acres), Magruder Mountain (625,015 acres) and Yellow Hills (62,203 acres). All allotments have year round grazing.

3.5 Historic Resources

Cultural or historic resources along IR-286 have not been inventoried. However, information available provides a general description of the type of cultural resources. Lithic scatters or isolated tools and associated manufacturing debris are the most common prehistoric sites. Rock shelters, caves and springside localities are the most common habitation sites were general activities took place.

Historic sites are normally associated with mining, ranching and/or railroads. Historic buildings and ruins are widely scattered throughout

the area and found in, but not limited to, Rhyolite, Beatty, Gold Point, Montezuma, Bonnie Claire and Lida.

3.6 Special Land Management Areas

Special Land Management Areas found from Points D and F under IR-286:

Death Valley National Monument
Grapevine Mountains Wilderness Study Area (WSA)
Queer Mountain WSA

IR-286 crosses the extreme northeast corner of Death Valley National Monument in Nevada. The portion crosses eight miles in the Bullfrog Hills. Recreation use is low in this area of the monument due to lack of road access.

About 10 miles of the route passes over the Grapevine Mountains WSA and about two miles pass over the Queer Mountain WSA. It will be very rare that an aircraft passes over the WSAs due to the higher, rugged terrain. The low flying aircraft will be primarily flying in the valleys.

3.7 Socioeconomics

No incorporated cities exist within the existing or proposed route. The entire route is within a sparsely populated area crossing both Nye and Esmeralda Counties. The Census Bureau population growth estimates (1980 to 1985) for Nye County are 14,700, Esmeralda County are 1,400 with respective growth rates of 55.3% and 75%. Nevada's population estimate is 937,000 with a growth rate of 17%.

There are four "population areas" under or near the route: Cyprus Specialty Metals Company settling ponds, Gold Point, Beatty and Bullfrog Mine (Table 2). All four areas are based on different social and economic environments.

Table 2. Estimated population that may be exposed to IR-286.

POPULATION AREA	PROPOSED ACTION
Cyprus Settling Ponds	12
Gold Point	20
Beatty	1,600
Bullfrog Mine	600
Other Mines	200
Total	2,432

The settling ponds for Cyprus Specialty Metals Company are within the route. A maximum of 12 employees would be working in the area on a regular five-day

work week. Most of the employees live in Silver Peak NV, but some live in Bishop CA. Cyprus Specialty Metals Company is a major producer of lithium.

Gold Point is a small community of no more than 20 people in Esmeralda County where most residents live a retirement lifestyle. There is no private land in Gold Point and all buildings are located in trespass on public land administered by the Tonopah Resource Area, Bureau of Land Management.

Beatty, a small community of about 1,600 in Nye County, Nevada, is located under IR-286. Mining is Beatty's main industry, and the population has about doubled in the past year due to new mining operations.

There are two brothels, Cottontail Ranch and Fran's Star Ranch, a few small mining mills, ranches, and a Recreational Vehicle Park along Hwy 95 north of Beatty NV.

There are several active mines directly under IR-286. The Bullfrog Mine is the largest and employees 600 people. The mines are 24-hour operations with approximately 350 workers for the day shift and 75 each for the swing and graveyard shifts. The people live at Beatty. There also is a construction camp near the Beatty Airport where about 200 people live. Approximately 200 people are employed by other mines, most of which are in the Beatty area. No current military aircraft special operating procedures are in effect for the mines.

Alternate Exit Point GX passes over a portion of the Divide Mining District. There are no permanent residents or active mines; however, the Divide District is an active gold mining exploration area with a few mining drilling crews scattered throughout the hills.

IR-286 passes over Hwy 95, Hwy 160, Hwy 266, Hwy 267, Hwy 374 and Hwy 774. Traffic can be considered to be moderate on Hwy 95 since it is the direct route between Reno and Las Vegas. Traffic can be considered to be light to very light on the other highways.

IR-286 is over the Cottontail Ranch airstrip, Scotty's Junction airstrip, Fran's Star Ranch airstrip and the Beatty Airport. A flight restriction for IR-286 is in effect to avoid the Beatty airport by 1,500 feet AGL or 3 NMs.

IR-286 parallels and passes under one major private air traffic VFR (Visual Flight Route) which follows Hwy 95. VFR traffic is normally at 4,500 to 6,500 feet AGL (6,500 to 8,500 feet MSL). IFR (Instrument Flight Route) traffic is normally above 8,000 feet AGL (10,000 feet MSL).

There is no relationship of IR-286 to the local economy. The economy of the area is based primarily on mining, the federal services within the TFWC Range Complex, tourism and retirement living. In 1987, mining represented 52.5% of the work force in Esmeralda County and 10% in Nye County. In 1986, there were 18 business establishments in Esmeralda County.

Cyprus Specialty Metals Company was and still is the largest employer in Esmeralda County. There were 227 businesses operating in Nye County in 1986. Economic and employment benefits flow to Tonopah, Beatty, Las Vegas, Reno and

Bishop CA. Bond International Gold, Inc. is the largest employer in the Beatty area.

3.8 Noise

This environmental assessment quantifies noise impacts using the day-night level (DNL) system of measurement. In the DNL scale, noise levels are averaged for a 24-hour period and represented as a continuous sound level. A 10-decibel (dB) penalty is added for noise events occurring between 2200 and 0700 hours. Since the DNL values are averages, a single noise event, such as an aircraft overflight, will actually be louder than the DNL cumulative noise level.

There are no communities or vehicle traffic for the majority of IR-286 that contribute to noise. As mentioned previously, there are four "population areas" under or near the existing and proposed route: (1) Cyprus Specialty Metals Company settling ponds, (2) Gold Point, (3) Beatty, and (4) Bullfrog Mine. The highest estimated noise levels of selected areas that may be exposed to IR-286 are shown in Table 3.

Table 3. Noise levels for the existing environment of selected areas that may be exposed to IR-286.

Area	DNL
Cyprus Settling Ponds	64
Hwy 95	64
Beatty NV	45
Gold Point NV	64
Death Valley National Monument	64
Wilderness Study Areas	64
Non-Flying Days	30[1]

DNL - average day-night noise level (dB)
dB - decibels
[1] - 30 DNL describes the noise exposure for uninhabited desert

Two complaints involving low level flying A-10s on IR-286 in 1988 were made by the same party. Cumulative day-night noise exposure levels on IR-286 at 100 feet AGL flight are shown in Table 4.

Table 4. Estimated noise levels along IR-286 for the Proposed Action and No-Action Alternative.

DISTANCE FROM CENTERLINE (NM)	NOISE LEVELS (DNL) PROPOSED ACTION	EXISTING CONDITIONS
0.0	85	64
0.25	60	54
0.5	54	48
0.75	49	43
1.0	44	34
1.25	40	26
1.5	38	23
1.75	35	21
2.0	33	18
3.0	29	14

DNL - average day-night noise level (dB)
NM - Nautical Mile

4.0 ENVIRONMENTAL CONSEQUENCES

4.1 Environmental Consequences of the Proposed Action

4.1.1 Geography and Soil

No change or impacts to the geography and soil would occur since there is no ground disturbance associated with the Proposed Action or No Action Alternative.

4.1.2 Climate and Air Quality

Climate would not be affected by the Proposed Action or No Action Alternative.

No change or impacts to air quality would occur since there is an insignificant increase in air flying time associated by the Proposed Action. There will only be eight additional sorties for a total of 96 minutes per day of additional flying time.

No change or impacts to air quality would occur with the No Action Alternative.

4.1.3 Vegetation

No change or impacts to vegetation would occur since there is no ground disturbance associated with the Proposed Action or No Action Alternative.

4.1.4 Animals

No significant impacts would occur to wildlife, wild horse and burro, desert tortoise populations or cattle grazing since IR-286 is a small ribbon passing through larger habitats and grazing allotments. The animals have become accustomed to the low flying aircraft since the route has been used for several years. No impacts would occur to habitats since there would be no ground disturbance associated with the Proposed Action.

Noise impacts and compatibility is discussed in Section 4.1.8.

4.1.5 Cultural Resources and Historic Preservation

No sites on or eligible for the National Register would be impacted by the Proposed Action or No Action Alternative.

4.1 6 Special Land Management Areas

No change or impacts to special land management areas would occur since there is no ground disturbance associated with the Proposed Action or No Action Alternative. In addition, IR-286 represents an insignificant portion of these special land management areas. Noise impacts and compatibility with Special Land Management Areas are discussed in Section 4.1.8.

4.1.7 Socioeconomics

The Proposed Action would have no effect on the socioeconomic environment. There is no relationship or correlation between the socioeconomic environment

and IR-286 except for the airspace. There is no conflict between military aircraft using IR-286 and private aircraft. Private aircraft maintain a vertical separation by flying above 1,500 feet AGL at about 6,500 feet AGL and above. Also, no military flights would occur near the Cottontail Ranch airstrip, Scotty's Junction airstrip, or Fran's Star Ranch airstrip as a result of the proposed action or the no-action alternative.

4.1.8 Noise

4.1.8.1 Noise Impacts on People

The proposed action would generate noise exposure levels along the route from 85 DNL directly under the flight path to less than 55 DNL at distances greater than one-half mile from the flight track. Table 5 displays the DNL exposure levels for population centers along IR-286 for the proposed action and the no-action alternative.

Table 5. Noise Exposure Levels for Population Centers Near the MTR.

	NOISE LEVEL AT DISTANCE FROM CENTERLINE					
	PROPOSED ACTION			NO ACTION		
POPULATION AREA	0 NM	1/4NM	1/2NM	0 NM	1/4NM	1/2NM
Cyprus Settling Ponds	85	60	54	64	54	48
Gold Point	85	60	54	64	54	48
Beatty*	60	54	49	54	48	42
Bullfrog Mine	85	60	54	64	54	48

Note: Flight restriction of 1,500 AGL and 3.0 NM currently applies.

4.1.8.2 Other Noise Impacts

Animals have the potential exposure levels identical to that of the special management areas shown in Table 6. However, animals would not be exposed to the noise levels on a continuous basis. Animals move, migrate, estivate, hibernate and/or live in dens or burrows. Animals are also either nocturnal, diurnal or curpuscular. In any event, all animals would be subject to similar noise levels generated by both alternatives. Therefore, there is anticipated to be no significant noise impacts on wildlife associated with the proposed action or the no-action alternative.

Noise exposure levels for special management areas is displayed in Table 6. The noise levels range from severe to slight exposure. The route would continue to lie over Death Valley National Monument and the WSAs.

Table 6. Noise exposure levels of selected special management areas for proposed action and the no-action alternative.

MANAGEMENT AREA	NOISE LEVEL AT DISTANCE FROM CENTERLINE PROPOSED ACTION 0 NM	1/4NM	1/2NM	NO ACTION 0 NM	1/4NM	1/2NM
Death Valley NM	85	60	54	64	54	48
Queer Mountain WSA	85	60	54	64	54	48
Grapevine Mountains WSA	85	60	54	64	54	48

Note: Typical Noise Exposure Level for a uninhabited desert is 30 DNL.

4.1.8.3 Mitigation

With a 1,500 ft AGL and 3.0 NM restriction, noise exposure levels along the route would vary from 54 DNL directly under the flight path to less than 42 DNL at distances greater than one-half mile from the flight track (Table 7). The noise impacts associated with the persons working at the Cyprus Settling Ponds are identical to that of the proposed action.

There is enough flexibility with the route width and terrain so that mission requirements would not be impaired. The flight restrictions are in compliance with current Federal Aviation Administration obstruction requirements. These are in accordance with FAA regulation 14 CFR 91.79, Minimum Safe Altitudes: to avoid congested areas by 1,000 feet above and 2,000 feet horizontally. Other than congested areas are to be avoided by 500 feet AGL.

Noise would likely be an important adverse aspect of the community environment. With an 85 DNL exposure level, the Shultz annoyance curve estimates that approximately 58% of the exposed population under IR-286 would be highly annoyed. If all persons in the area were directly under the flight track, this would equate to 500 persons being highly annoyed (Table 8) as opposed to the current estimated amount of 198 persons (There were two documented complaints in 1988). The avoidance procedures of the proposed mitigation lowers the number of persons exposed to the 85 DNL to isolated individuals. The larger population areas would be exposed to a DNL of less than 60 dB (estimated level of 123 persons highly annoyed).

Table 7. Noise levels associated with the proposed mitigation (areas that could be considered noise sensitive)

POPULATION AREA	NOISE LEVEL AT DISTANCE FROM CENTERLINE 0 NM	1/4NM	1/2NM
Gold Point	54	48	42
Beatty[1]	54	48	42
Bullfrog Mine	54	48	42

[1]Special operating procedures are already in effect.
Note: Noise Exposure Level for a small town is 45 DNL.

Table 8. Estimated population that would be annoyed by the aircraft noise generated on IR-286.

Population Area	Highly Annoyed Population	
	Number	% of Total Pop
Proposed Action	500	21
No-Action Alternative	198	8
Proposal with Mitigation	123	5

4.1.9 Unavoidable Adverse Impacts

The proposed action would result in the potential for 21% of the exposed population (500 people) being highly annoyed. The no-action alternative or the existing noise environment should result with 8% of the population (198) under the flight path of IR-286 as being annoyed even though there has only been two documented complaints. With the proposed mitigation, this drops to 5% of the effected population (123 people).

4.2 Short Term Use Versus Long Term Productivity

The short term use would have no effect on the long term productivity with the proposed action or the no-action alternative.

4.3 Irreversible and Irretrievable Commitment of Resources

No irreversible or irretrievable commitment of resources would occur from the proposed action or the no-action alternative.

5.0 RELATIONSHIP BETWEEN THE PROPOSED ACTION AND LAND USE PLANS, POLICIES AND CONTROLS

The proposed action and the no-action alternative with mitigating measures are consistent with existing land use plans.

The Nevada Statewide Comprehensive Outdoor Recreation Plan does not identify Air Force flight activities as an issue.

The proposed action with mitigating measures are consistent with FAA regulations, 14 CFR 91.79, Minimum Safe Altitudes. The no-action alternative or the existing situation is not consistent with FAA regulations, 14 CFR 91.79.

The Nevada State Clearinghouse, Bureau of Land Management, and the National Park service were given an opportunity to comment.

6.0 MITIGATION AND SPECIAL STIPULATIONS

Avoid flight within 1,500 feet slant distance for 3 nautical miles in the areas around Gold Point, Beatty, Beatty Airport, Cottontail Ranch airstrip, Scotty's Junction airstrip, and Fran's Star Ranch airstrip.

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APPENDIX I
Route Description of IR-286
(Existing)

Altitude Data	Pt	Fac/Rad/Dist	Lat/Long
140 MSL or as asgn to	A	LSV 277/42	36°30.0'N 115°50'W
71 MSL B 140 MSL to	B	BTY 111/30	36°30.0'N 116°15.0'W
05 AGL B 71 MSL to	C	BTY 135/11	36°38.0'N 116°38.0'W
05 AGL B 90 MSL to	D	BTY 104/3	36°46.5'N 116°41.5'W
05 AGL B 90 MSL to	E	OAL 129/23	37°41.0'N 117°30.0'W
SFC B 98 MSL to	F	OAL 103/17	37°52.0'N 117°28.0'W
SFC B 98 MSL to	G	OAL 074/14	38°00.0'N 117°28.0'W
SFC B 90 MSL to	H	TPH 346/16	38°18.0'N 117°01.0'W
SFC B 94 MSL to	I	TPH 055/30	38°11.0'N 116°25.0'W
SFC B 95 MSL to	J	TPH 084/73	37°47.0'N 115°32.0'W
SFC B 94 MSL to	K	TPH 090/82	37°37.0'N 115°23.0'W
SFC B 94 MSL to	L	TPH 097/87	37°26.0'N 115°22.0'W
SFC B 94 MSL	M	TPH 115/99	36°55.0'N 115°30.0'W
Alternate Entry: Point I			
170 MSL or as asgn at	AA	TPH 017/49	38°42.0'N 116°27.0'W
Descend to 140 MSL to	BB	TPH 025/35	38°28.0'N 116°32.0'W
Descend to 105 MSL to	CC	TPH 035/28	38°19.0'N 116°34.0'W
Descend to 94 MSL to	I1	TPH 055/31	38°11.0'N 116°25.0'W
Alternate Entry: Point G			
Alternate Exit: Point G			
SFC B 98 MSL at	G1	OAL 074/14	38°00.0'N 117°28.0'W
90 MSL to	GX	OAL 086/33	37°53.0'N 117°06.0'W
Thence to Nellis Target Area 71			
Alternate Exit Point I			
SFC B 94 MSL at	12	TPH 055/31	38°11.0'N 116°25.0'W
SFC B 90 MSL to	IX	TPH 090/30	37°53.0'N 116°26.0'W
Thence to Nellis Target areas 72, 73, 74 or R-4809.			
Alternate Exit: Point J			
SFC B 95 MSL at	J1	TPH 084/73	37°47.0'N 115°32.0'W
SFC B 90 MSL to	JX	TPH 092/58	37°43.0'N 115°53.0'W
Thence to Nellis Target areas 72, 73, 74 or R-4809.			

TERRAIN FOLLOWING OPERATIONS: Terrain Following Authorized -VFR beginning at C.

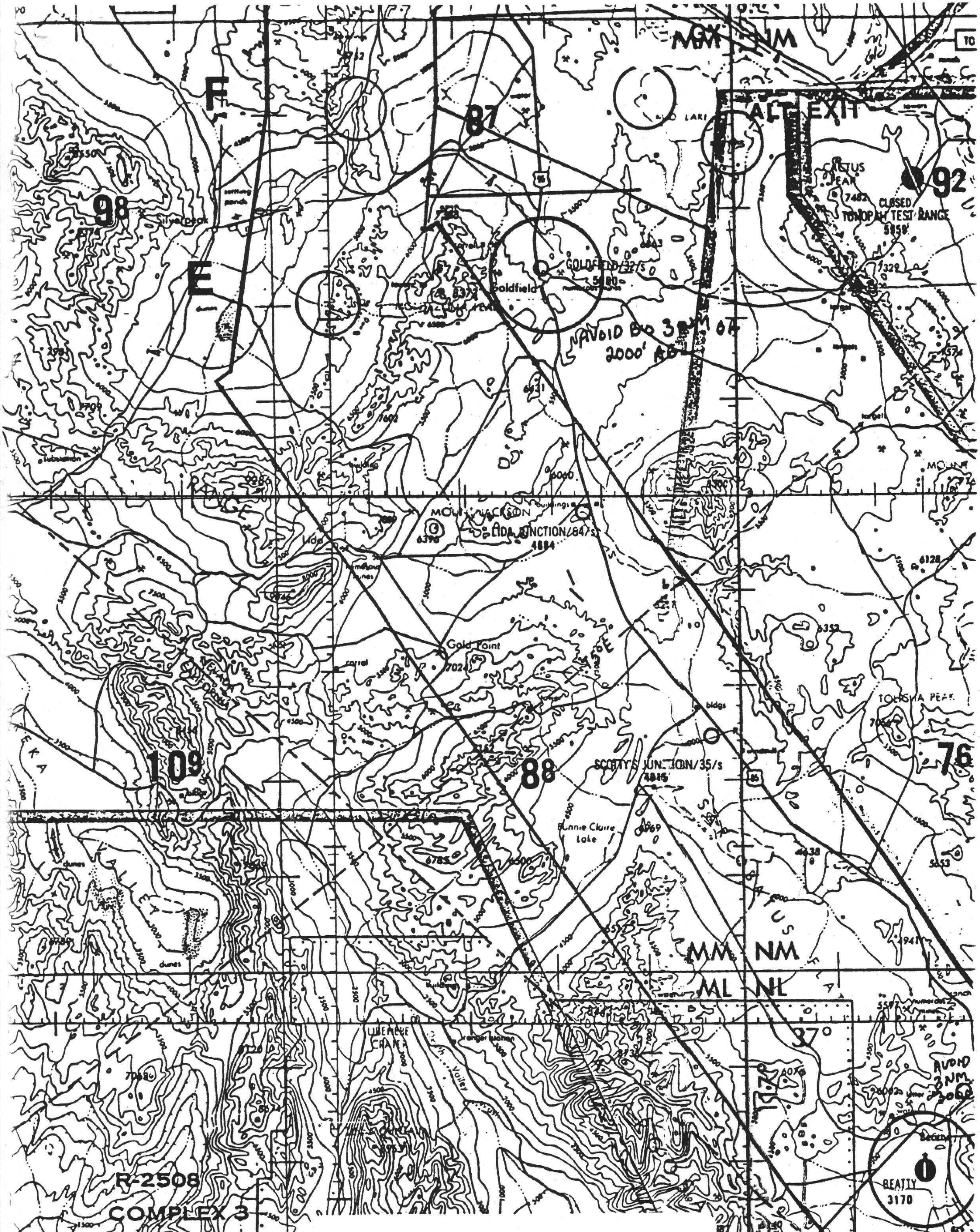
ROUTE WIDTH - 5 NM either side of centerline from A to D; 8 NM either side of centerline (excluding R-4807) from D to E; 5 NM either side of centerline from E to M.

APPENDIX II
Route Description of IR-286
(Proposed)

Altitude Data	Pt	Fac/Rad/Dist	Lat/Long
140 MSL or as asgn to	A	LSV 277/42	36°30.0'N 115°50'W
71 MSL B 140 MSL to	B	BTY 111/30	36°30.0'N 116°15.0'W
05 AGL B 71 MSL to	C	BTY 135/11	36°38.0'N 116°38.0'W
01 AGL B 90 MSL to	D	BTY 104/3	36°46.5'N 116°41.5'W
01 AGL B 90 MSL to	E	OAL 129/23	37°41.0'N 117°30.0'W
SFC B 98 MSL to	F	OAL 103/17	37°52.0'N 117°28.0'W
SFC B 98 MSL to	G	OAL 074/14	38°00.0'N 117°28.0'W
SFC B 90 MSL to	H	TPH 346/16	38°18.0'N 117°01.0'W
SFC B 94 MSL to	I	TPH 055/30	38°11.0'N 116°25.0'W
SFC B 95 MSL to	J	TPH 084/73	37°47.0'N 115°32.0'W
SFC B 94 MSL to	K	TPH 090/82	37°37.0'N 115°23.0'W
SFC B 94 MSL to	L	TPH 097/87	37°26.0'N 115°22.0'W
SFC B 94 MSL	M	TPH 115/99	36°55.0'N 115°30.0'W
Alternate Entry: Point I			
170 MSL or as asgn at	AA	TPH 017/49	38°42.0'N 116°27.0'W
Descend to 140 MSL to	BB	TPH 025/35	38°28.0'N 116°32.0'W
Descend to 105 MSL to	CC	TPH 035/28	38°19.0'N 116°34.0'W
Descend to 94 MSL to	I1	TPH 055/31	38°11.0'N 116°25.0'W
Alternate Entry: Point G Alternate Exit: Point G			
01 AGL B 98 MSL at	G1	OAL 074/14	38°00.0'N 117°28.0'W
01 AGL B 90 MSL to	GX	OAL 086/33	37°50'N 117°00.0'W
Thence to Nellis Target Area 71 Alternate Exit Point I			
SFC B 94 MSL at	12	TPH 055/31	38°11.0'N 116°25.0'W
SFC B 90 MSL to	IX	TPH 090/30	37°53.0'N 116°26.0'W
Thence to Nellis Target areas 72, 73, 74 or R-4809.			
Alternate Exit: Point J			
SFC B 95 MSL at	J1	TPH 084/73	37°47.0'N 115°32.0'W
SFC B 90 MSL to	JX	TPH 092/58	37°43.0'N 115°53.0'W
Thence to Nellis Target areas 72, 73, 74 or R-4809.			

TERRAIN FOLLOWING OPERATIONS: Terrain Following Authorized – VFR beginning at C.

ROUTE WIDTH - 5 NM either side of centerline from A to D; 8 NM either side of centerline (excluding R-4807) from D to E; 5 NM either side of centerline from E to M.


F
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ALT EXIT
CACTUS PEAK
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CLOSED
TONOPAH TEST RANGE
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GOLDFIELD/32/S
5680
Goldfield
Silverpeak
AVOID BO 3 NM OR
2000' AGL
MOUNT JACKSON
6398
LIDA JUNCTION/64/s
4884
Lida
Gold Point
7024
SCOTTY'S JUNCTION/35/s
4816
Bonnie Claire
Lake
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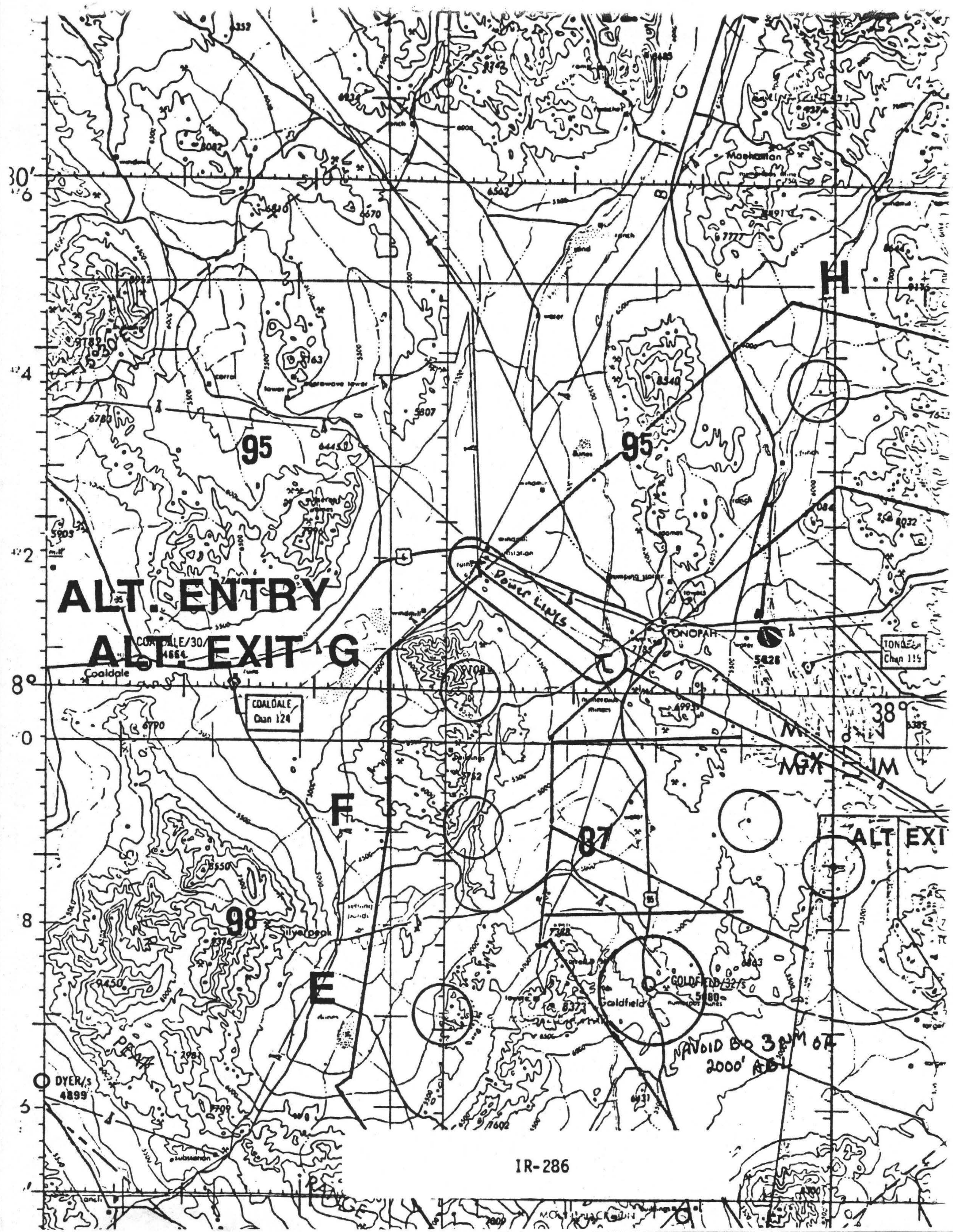
COMPLEX 3

IR-286



ALT. ENTRY
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Manhattan
Goldfield
Silverpeak
DYER/5
4899
ALT EXI
Power Lines

12/26/90

BOB MILLER
Governor

STATE OF NEVADA

TERRI JAY
Executive Director

CATHIE BARCOMB
Assistant to the Director

Nellis

COMMISSION FOR THE PRESERVATION OF WILD HORSES

Stewart Facility
Capitol Complex
Carson City, Nevada 89710
(702) 687-5589

December 26, 1990

John B. Walker, Coordinator
Nevada State Clearinghouse
Blasdel Building, Rm 204
Carson City, Nevada 89710

Dear Mr. Walker,

I have reviewed the EA IR-286 Altitude Revision Between Points D and F and Alternative Exit GX EA-88-39. I have enclosed extra copies of pages 10 and 11 that were missing from the document you sent me. I obtained them from Erik Watkins at Nellis.

Since this was done in 1987 and instigated in 1988 any "damage" done from these flights has already been done. I am not quite sure how an agency, even TAC Headquarters, can decide not to put an EA out for public review and to have signed the FONSI with no review period.

My main concern with this EA is that no wild horse specialist was consulted before deciding on "damage" or "effects" to the wild horse populations. To lower the flights from 500 feet AGL to 100 feet AGL is quite a difference. The document does not mention that "foaling season" was taken into account. The BLM has mandated policy not to fly any herd areas from March 1, to June 30, to prevent any unnecessary disturbances during the foaling season for wild horses. In addition, helicopters are prohibited from flying 6 weeks before those dates and 6 weeks after those dates on any flights under 500 feet.

As in my previous letter to you on another issue, determinations were made and instituted without consulting the specialists on the ground. The wild horse and burro specialists working for the BLM are responsible for the animals in their districts. Those people would know have known if the flights would have effected the wild horse population and would have been able to suggest alterations. At the time, "foaling season" should have been taken into account when setting up the flying schedules, especially with flying at such low altitudes.

If you have any questions, please feel free to call.

Sincerely,

(O)-1074

CB

(O)-1074