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[As submitted to the Air Force and Bureau of Land Management on Dec. 30, 1998.]

Comments on the Draft Legislative Environmental Impact Statement for the Renewal of the Nellis Air Force Range

Submitted By
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December 1998

As a Nevada resident, I am submitting the following comments on the [Draft Legislative Environmental Impact Statement](#) for the [Renewal of the Nellis Air Force Range](#), which was released in September 1998.

Since my comments are quite lengthy, I have divided this document into three parts: In [Part I](#), I summarize my comments and the philosophy behind them. In [Part II](#), I list specific inadequacies I see in the Draft LEIS, moving sequentially through the pages of the report. Finally, in [Part III](#), I offer some general conclusions and recommendations.

Part I: Summary of Comments

Most of my comments are relevant only to Alternatives [1B](#) and [2B](#) in the report. This is the proposal for "administrative realignment" of certain areas, in addition to the renewal of the Nellis Range as it now exists. In Alternatives 1B and 2B, some lands currently under [Department of Energy](#) control would be transferred to the [Air Force](#), while some lands under Air Force control would be transferred to DOE.

Specifically, DOE would obtain control of the Pahute Mesa area, which it is currently using, while the Air Force would obtain control of the lands currently withdrawn by DOE under [Public Land Order 1662](#) (PLO 1662). These latter lands, popularly known as "[Area 51](#)", are the site of a classified Air Force facility at Groom Dry Lake.

My primary criticism throughout this report is that virtually no environmental information has been provided for the PLO-1662 lands, and that this omission threatens the integrity of the rest of the report as well.

I understand from reading local newspapers that under a recent federal court ruling (in [Frost vs. Perry](#)) and [an annual exemption from the President](#), that the Air Force may be entitled to withhold from the public certain environmental data about the Groom Lake base which is deemed a risk to national security. If this is true, I believe that the report should state this explicitly, specifying the general parameters of what is being withheld and the legal authority for doing so.

As it stands, the Draft LEIS omits most data regarding the PLO-1662 land, with no mention of what is being omitted or why. This, I believe, jeopardizes the integrity of the entire report, since the reader cannot distinguished between "Negative Data," "No Research," "Classified Data" or "Overlooked Data."

To take a simple example, Figure 3.5-5 on Page 3.5-8 of the Draft LEIS provides a map of earthquake faults throughout the Nellis Range, the Nevada Test Site and surrounding areas. There are no earthquake faults shown within the block of land defined by PLO-1662. This strikes me as curious, because faults are often associated with mountain ranges, and a portion of one small range, the Papoose Range, is located within the PLO-1662 lands; yet, the map shows no faults associated with these mountains. Knowing that other environmental data on PLO-1662 has been withheld, the reader is left in the dark about what the absence of data means. He must choose between these possible alternatives:

1. Geological surveys have been conducted within the PLO-1662 lands, and no faults have been found. (Negative Data.)
2. No faults have been found because no survey has been conducted within this area. (No Research.)
3. Faults have been identified, but information about them has been deemed a risk to National Security and thus has been withheld. (Classified Data.)
4. Faults have been identified, but information about them has been omitted due to an administrative error. (Overlooked Data.)

The fact that the authors of the report chose to include the fault map implies that this kind of data could conceivably have an impact on the environmental process. The fact the most faults in this area seem benign does not remove the need for complete data. If one is going to create such a map, it should be reliable, and the absence of data on PLO-1662 lands elsewhere in the report leaves the reader questioning the map. If we look at another portion of the map where there are no faults shown, we must ask the same question: Is this no fault, a classified fault, or a "fault" in the report itself?

Likewise, on page 1-16 of the Draft LEIS, a map of area roads omits all roads within PLO 1662 land. In addition, it omits several prominent roads in the NAFR that lead to PLO 1662 land. It even omits the extensions of these roads into public land and the Nevada Test Site. If facilities within PLO 1662 land are kept secret through a special exemption, the reader is left to wonder where this exemption ends. Does it end at the boundaries defined by PLO 1662, or does it include wide portions of the current NAFR, public land and the NTS as well? As a citizen who might have some valid environmental issues to raise, I cannot comment intelligently on any omission anywhere in the report so long as undefined parts of the data are withheld without notation.

In the specific case of the fault map, the ambiguity would easily be resolved by a simple statement in the text like this: "Complete surveys have identified no faults within the lands described by PLO-1662."

Similarly, most of the other objections I raise in Part II would be resolved by a statement at the beginning of the report saying what kind of data is being withheld and under what authority. Later in the report as specific environmental issues are reviewed, one-sentence statements can refer back to the original statement. (E.g. "This data is being withheld under Presidential exemption, see Section XX.")

Further suggestions are provided in [Part III](#).

Part II: Specific Inadequacies

In this section, I will go through the Draft LEIS page-by-page to point out inadequacies I see in the report. Most of these

objections concern the omitted data problems I have described above, and most would be rendered moot if Alternatives 1B and 2B were not included in the Air Force proposal.

Many of the comments I make on the Executive Summary also apply to the corresponding sections of the main report.

Executive Summary: Page ES-3.

The report states:

Lands within PLO 1662, adjacent to the South Range, are withdrawn for the Nevada Test Site by DOE and used through a Memorandum of Agreement with the Air Force.

Consistent with the descriptions of the North and South Ranges in the same section, a short description of activities and facilities on the PLO 1662 lands should be given, even if to simply state that they are classified.

Also, more information should be given on the Memorandum of Agreement, which is not further specified anywhere else in the document. At least the date or document number should be given to allow this Memorandum to be located or referred to. Unlike Public Land Orders and Public Laws, internal memoranda like this are not easily located without more specific information. If the Memorandum of Agreement is classified, this should be stated, as it frees researchers such as myself from filing repeated FOIA requests for it. (My own FOIA requests to Nellis and [DOE](#) have failed to produce the document or any useful information about it.)

Executive Summary: Page ES-3.

The report states:

The North Ranges includes Pahute Mesa and other areas, which are used by DOE through mutual agreement.

Consistent with the descriptions of the North and South Ranges in the same section, a short description of DOE activities and facilities on Pahute Mesa lands should be given. Even if DOE controls those facilities, they will remain part of the Nellis Range under Alternatives 1A and 2A, so it would be useful to know what is there.

Executive Summary: Page ES-4.

The report states:

The process for receiving input includes the following:

- Six public scoping meetings in communities surrounding NAFR.

A note should be added here that although these meetings were indeed held, the public was given no information at the time that PLO 1662 lands would be included in the renewal. The Notice of Intent which announced the scoping meetings (Federal Register: May 30, 1996) mentioned only PL 99-606 and the alternatives given did not include any administrative realignment. Since the public was not told of possible administrative realignment of PLO 1662 (or of any other land), the public could not offer any meaningful input, and the scoping process was effectively bypassed for this part of the current Air Force proposal.

I personally was led to believe that PLO 1662 was not involved in the Range Renewal. Several days before the scoping meeting in Las Vegas on June 20, 1996, I contacted the Nellis Public Affairs officer, Capt. Andrew Bourland, and requested a township/range description of the lands affected by the Range Renewal. I told him that I could not offer meaningful comment unless I knew what lands I was commenting on. Upon my arrival at the scoping meeting I was given a township/range list similar to that found in Appendix A.10 of the draft LEIS. I determined that PLO 1662 lands

were not included on that list, and on this basis I declined comment. Indeed, if I had commented, these comments would not have been relevant because they were not part of the published purpose of the meeting as defined in the Notice of Intent. Because PLO 1662 lands were never mentioned, I and any other citizen interested specifically in these lands were effectively excluded from the scoping process -- even if we attended the meetings -- and our potential concerns could not have been addressed in the Draft LEIS.

Executive Summary: Page ES-5.

The report provides a list of issues and concerns raised at the scoping meetings.

Again, a notation should be added here that these issues and concerns do not include PLO 1662 lands, which the public was not given the opportunity to comment on.

Executive Summary: Page ES-7.

Regarding Alternative 1A, the report states:

Overlapping withdrawals of NAFR and DNWR lands would remain.

For clarity, it should also be stated here that the PLO 1662 lands would remain under DOE control.

Executive Summary: Page ES-11.

Regarding the section "Hazardous Materials and Solid Waste Management" ...

Although information is provided about contaminated sites on the existing NAFR land, none is provided for PLO 1662 lands. The same information that is provided for NAFR should also be provided for PLO 1662 lands.

If this information is classified, the LEIS should say so, and there would seem no national security risk in at least stating the number of contaminated sites within PLO 1662.

It should also be stated who will be responsible for environmental cleanup in PLO 1662 lands under Alternatives 1B and 2B, and under what program the sites are currently being identified and cleaned up (for example, FFACO or IRP, as is listed for DOE and NAFR lands).

Executive Summary: Page ES-12.

Regarding the section "Earth Resources"...

Information on prior mining should be given for PLO 1662 lands, as it has for NAFR lands. (If it is the same as NAFR lands, this should be stated.) I am particularly interested in knowing in what year commercial mining stopped in this area.

In addition, there should be a statement as to whether any mining or tunnelling has taken place in NAFR or PLO 1662 lands since they were withdrawn from public use.

Executive Summary: Page ES-13.

Regarding the section "Water Resources"...

Information on water resources should be given for PLO 1662 lands, as it has for NAFR lands.

Executive Summary: Page ES-13.

Regarding the section "Biological Resources"...

Information on biological resources should be given for PLO 1662 lands, as it has for NAFR lands, even to simply state that they are the same as NAFR.

Executive Summary: Page ES-14.

Regarding the section "Cultural Resources"...

Information on cultural resources should be given for PLO 1662 lands, as it has for NAFR lands. The number of identified cultural resources on these lands should be stated.

Since access to PLO 1662 lands has been highly restricted, I would like to know to what extent surveys have been conducted to identify cultural resources. Is the cultural survey of this area considered complete, or has national security hindered it?

Purpose and Need for the Proposed Action: Page 1-9.

In the text section "Overview and History of NAFR"...

A brief history of the PLO 1662 lands should be provided, as it is for the NAFR.

Purpose and Need for the Proposed Action: Page 1-11.

Regarding the table entitled "NAFR History"...

A list of land transactions for PLO 1662 should be provided as an additional table. PLO 1662 itself should be listed here, along with the Memorandum of Agreement between DOE and Air Force, and any other transactions affecting this land.

Purpose and Need for the Proposed Action: Page 1-15.

Regarding the map entitled "NAFR Supporting Airfields and Facilities"...

This map should include the airfield adjacent to Groom Dry Lake, as seen in unclassified satellite images. Although these facilities are not currently part of the NAFR, they would be under Alternatives 1B and 2B.

Purpose and Need for the Proposed Action: Page 1-16.

Regarding the map entitled "Roads on the Nellis Air Force Range"...

A number of prominent, well-maintained roads are missing from this map, both inside the PLO 1662 land and leading to it through the current NAFR. These missing roads can be plainly seen in published U.S. Geological Survey topographic maps and unclassified satellite images.

Within the current NAFR, at least three actively-maintained, two-lane, all-weather access roads are missing from the map. As a former resident of Rachel, Nevada, I am aware of two major access roads leading into the range from Highway 375 but not appearing on the map beyond the NAFR border. As a past visitor to the Nevada Test Site, I am aware of a third major road leading into the range from the northeastern corner of the NTS, also not shown on the map. Here is an approximate description of these roads based on the map on page 1-16...

- One road starts from State Route 375, about halfway between Rachel and the Lincoln/Nye county line and heads

south through NAFR to the vicinity of PLO 1662 and the northeastern corner of the NTS. Even portions of this road on public land north of the NAFR border are omitted, as is another heavily used road that feeds into this one from Route 375 just southeast of Rachel.

- One road starts at the southernmost point on State Route 375 and follows a route west-southwest as shown on the map. On the map, this highway ends when it reaches the NAFR boundary. In truth, that road continues in the same general heading through the NAFR until it intersects the PLO1662 land.
- One road starts at the northeastern corner of the road network shown within the NTS. It heads northeast into the NAFR, then continues east to intersect with the PLO 1662 land. (In the NTS, this is known as the northern part of the Mercury Highway.)

For further information on these roads, one can consult the USGS 1:100,000 scale topographic map entitled "Pahrnagat Range, Nevada" (1985) and other current topographic maps of the area. For the Mercury Highway leading northeast out of the NTS and into the NAFR, one can consult any published DOE map of the Nevada Test Site.

Inside the PLO 1662 land, there are dozens of major roads not given on the map. Consult the topographic map above or USGS Landsat imagery of the area.

Purpose and Need for the Proposed Action: Page 1-24.

In the section entitled "NAFR Environmental Programs," the report states:

Within the bounds of available funding, each of these programs has been, or is being, completed on the NAFR.

It should also be stated whether the environmental programs have been completed in the PLO 1662 lands as well.

The same information provided for NAFR in that paragraph (beginning with the quote above) should also be provided for PLO 1662. Does the Air Force maintain environmental compliance within the PLO 1662 lands?

Purpose and Need for the Proposed Action: Page 1-30 and 1-31.

Two tables are provided to specify the minimum and maximum projected sortie-operations for various aircraft in the North Range, South Range and MOA. The same information should also be provided for sorties from the PLO 1662 land or R-4808W. If this information is classified, the report should say so.

Description of Alternatives: Page 2-1.

In the section entitled "Process for Identification of Alternatives," the report repeats and expands upon the corresponding sections in the Executive Summary, pages ES-4 and ES-5. My comments on those pages (above) also apply here (that PLO 1662 lands were excluded from the scoping process).

Other comments I made on the Executive Summary (pages ES-4 and ES-5) also apply to the corresponding sections of this "Description of Alternatives" chapter (that issues could not have been contributed from the public regarding PLO 1662).

Affected Environment: Airspace. Page 3.1-4

In the section regarding airspace "R-4808 (R-4808N and R-4808S)," the report says that that portions of this airspace "are used for military aircraft transit to and from R-4807 A/B. The report fails to indicate that the airspace also supports aircraft whose final destination is R-4808 (the base at Groom Lake). These flights includes frequent weekday passenger service between McCarran Airport and Las Vegas, which can be seen landing at the base from public vantage points.

Aircraft that land present a different environmental profile than those that merely transit an airspace at altitude, so both kinds of flights should be mentioned in this section.

Affected Environment: Hazardous Materials and Solid Waste. (Section 3.4)

This comment applies to this entire chapter (pages 3.4-1 to 3.4-17)...

Information on hazardous materials and solid waste sites within PLO 1662 land is completely absent from this chapter. The same information that is provided for NAFR should also be provided here for PLO 1662 land.

The details of certain sites within PLO 1662 land may be classified, but that should not prevent the report from listing the number of identified sites and whether they are in compliance with environmental regulations.

The report should also state who is currently responsible for hazardous materials cleanup in PLO 1662 land -- Air Force or DOE -- and who will be responsible if Alternative 1B or 2B takes effect.

Affected Environment: Earth Resources. (Section 3.6)

As in the preceding chapter, the text of this chapter provides no information on the geology of PLO 1662 land. If the geology in this area is the same as that of NAFR, the report should say so.

The maps in this chapter show a confusing combination of inclusions and omissions for PLO 1662 land. The Physiographic Map (Page 3.5-3) appears to be complete for PLO 1662 land, but the General Geology map (Page 3.5-5) omits data for this land (as do the maps on page 3.5-31 and 3.5-40). The Mineral Potential on pages 3.5-16 through 3.5-18 both include and omit data for PLO 1662 land, showing some mineral potentials but obviously excluding others.

Other maps within this chapter are ambiguous. (See page 3.5-7, 3.5-8, 3.5-20, 3.5-21, 3.5-27, 3.5-29, 3.5-30, 3.5-32, 3.5-33, 3.5-34, 3.5-35.) As discussed in [Part I](#), it is not clear whether the blank space for PLO 1662 land reflects "Negative Data," "No Research," "Classified Data," or "Overlooked Data."

Affected Environment: Water Resources. (Section 3.6)

As in the preceding "Earth Resources" chapter, this chapter on water resources includes a confusing mix of included, omitted and ambiguous data regarding PLO 1662. For example, the maps on pages 3.6-4 and 3.6-5, omit data for PLO 1662 land, while the map of page 3.6-8 seems to include it. The text seems to refer only to NAFR, and makes no mention of PLO 1662 land.

The same information provided for NAFR in this chapter should also be provided for PLO 1662 land.

Affected Environment: Air Quality. Section 3.7.

This chapter makes no mention of "exotic" air pollutants that might result from the testing of weapons systems in the NAFR and PLO 1662 land. Instead, this chapter seems to focus only on pollution from the burning of conventional hydrocarbon fuels and the explosion of conventional ordnance. A new kind of aircraft, weapons system or weapon component, such as Stealth aircraft or its radar absorbant covering, might produce a different class of pollutants from conventional military hardware.

Have other air pollutants been identified emanating from either NAFR or PLO 1662 land? The report should summarize the surveys made for exotic pollutants and the available data. (If the data is classified, the report should say so.) This is important for distinguishing between the Action and No Action alternatives, at least in regards to emissions from weapons testing in the current NAFR (which would presumably end under the No Action alternative).

Affected Environment: Air Quality. Page 3.7-8.

The report provides a table of Baseline Ground-based and Airspace Emissions.

Any facility within PLO 1662 should be included in this list. (If this data is classified, the report should say so.)

Affected Environment: Biological Resources. (Section 3.8)

This chapter appears to omit all biological data for PLO 1662 land. The same information that is provided for NAFR should also be provided for PLO 1662 lands.

Affected Environment: Cultural Resources. (Section 3.9)

This chapter appears to omit all data for PLO 1662 land. The same information that is provided for NAFR should also be provided for PLO 1662 lands.

Affected Environment: Land Use. (Section 3.10)

This chapter appears to omit all data for PLO 1662 land. If there is no civilian land use within PLO 1662 land (as seems likely), the report should simply say so.

Affected Environment: Wilderness and Wilderness Study Areas. (Section 3.11)

This chapter appears to omit all data for PLO 1662 land. If there are no wilderness designations within PLO 1662 land, the report should say so. The report should indicate whether (a) complete wilderness surveys have been conducted with no appropriate lands identified, or (b) complete wilderness studies have not been conducted. (There should be nothing classified in whether a survey has been conducted.)

Appendix A.10: Land Description (Volume 2)

This appendix should include a township/range description of PLO 1662 lands (as has already been provided for PLO 7131 lands on page A.10-4).

The table on Page A.10-5 should include land disturbance information of PLO 1662 land.

Appendix C: Relevant Federal, State, and Local Statutes, Regulations, Agreement, and Guidelines (Volume 2)

This section fails to include Presidential Determinations [95-45](#), 96-54, [97-35](#). and subsequent annual determinations which exempt the Air Force's Groom Lake operating location from certain environmental reporting. It is important that these documents be listed, especially if they are being used as a legal basis for withholding information about PLO 1662 land.

Appendix F: Water Analysis (Volume 2)

Table F-1 (Page F-1): This table on dry lakes fails to include any data on Groom Lake, even the portion which is within the current NAFR. This dry lake should be listed. If necessary, the table can distinguish between the portion of Groom Lake which is within the NAFR and the portion that is within PLO 1662 land.

Table F-2 (Page F-3): The sequentially numbered Collector Watershed Designations for Emigrant Valley appears to omit "L-2". The data for this area should be included in the table.

Table F-3 (Page F-5): The sequentially numbered Alluvial Fan Designations for Emigrant Valley appears to omit "L-F2", "L-F3" and "L-F4". The data for these areas should be included in the table.

Appendix G: Biological Resources Data (Volume 2)

Appendices G-1 and G-2 fail to include any resource data for PLO 1662 land. If similar studies have been conducted for PLO 1662 land, they should be included here. If no such studies have been conducted, the report should state this.

Part III: Conclusions and Recommendations

The renewal of the Nellis Air Force Range, as its borders now exist, is a relatively straightforward and non-controversial action. Matters are greatly complicated by the inclusion of Alternatives 1B and 2B, which attempt to merge a highly secretive facility into a relatively open one. While some activities on the existing Nellis Range may be classified, basic geographic and environmental data is not. In the case of PLO 1662 and the facilities located there, the Air Force is attempting to withhold nearly all geographic and environmental information, even that which is available from open sources and that could have no possible bearing on national security.

In a series of annual Presidential Determinations ([95-45](#), etc.), President Clinton has exempted the Air Force from certain environmental reporting requirements which all other military facilities, classified or unclassified, must obey. The President states:

I hereby exempt the Air Force's operating location near Groom Lake, Nevada from any Federal, State, interstate or local provision respecting control and abatement of solid waste or hazardous waste disposal that would require the disclosure of classified information concerning that operating location to any unauthorized person.

It is plausible that certain environmental data concerning hazardous waste disposal could pose a risk to national security. For example, if a hostile foreign power had access to the exact composition of soil samples from a classified location, it might be able to deduce something about the secret weaponry tested there. There is no need, however, for the Air Force to provide that kind of detailed data in the LEIS. The LEIS is mainly a broad summary of environmental data and compliance. It is not necessary that the Air Force reveal the activities at a classified location, but it should be able to state that it is in compliance with environmental regulations there. It should also be able to provide routine information about the natural environment and manmade artifacts (such as roads) that are plainly visible. Congress and the public may not need to know the exact nature of a certain hazardous waste site, but they should be informed that sites have been identified and be told how environmental clean-up will be affected by each of the proposed alternatives.

One weakness of the Presidential Determination is that it provides no geographic definition of the "operating location near Groom Lake, Nevada." We don't know if it includes only areas immediately adjacent to the base, the entire extent of PLO 1662 lands, or lands extending far into the existing Nellis Range and NTS. Judging from the omission of roads on Page 1-16 of the LEIS (as mentioned in [Part II](#)), the exemption seems to cover hundreds of square miles of the existing Nellis Range, the NTS and even portions of public land.

Another weakness is that the President provides no guidance on what "would require the disclosure of classified information" about the facility. Would the release of information about flora, fauna and geology require the disclosure of classified information? I am sure that certain conservative military managers would interpret it that way (and evidently they have prevailed in the preparation of this LEIS). By the same reasoning, though, one could argue that acknowledging the existence of the state of Nevada might, in some obscure way, reveal classified information about the Groom Lake facility. The fact is, the state of Nevada does exist, as a matter of public record, as do the roads, wildlife and water resources of the PLO 1662 lands. Withholding this kind of routine information may protect the Air Force politically, but it fails the test of reasonableness for the disclosure of classified information.

Without a geographic definition and without any guidance as to interpretation of the Presidential Determination, there are effectively no boundaries for the exemption, and the Air Force is free to apply it arbitrarily to any area within its control, inside or outside of the PLO 1662 land. An arbitrary exemption means that the entire LEIS is meaningless, because any environmental data anywhere in the report can be omitted without notice. The bureaucratic risk is that the only information appearing in the LEIS might be that which is supportive of the sponsor's political agenda.

Recommendations

To preserve the integrity of the LEIS, I see two possible alternatives. One is to entirely remove PLO 1662 lands from the proposals for Alternatives 1B and 2B. The realignment of those lands can then be handled by some other petition to Congress which is specifically designed for the special circumstances of this operating location.

The other alternative is to provide clear statements in the LEIS about what data is classified and withheld from the public. As mentioned in [Part I](#), the Air Force could provide a statement at the beginning of the LEIS outlining what kind of data is classified and under what authority it is being withheld. Then, elsewhere in the report where classified information is omitted, a single sentence can be inserted referring readers back to the original statement.

If the Air Force feels that it is not legally required to provide environmental data to Congress about PLO 1662, then it should say so in the beginning of the report. Likewise, if the Air Force chooses instead to prepare a classified supplement for the PLO 1662 land, at least its existence should be mentioned in the public report. Making these statements explicitly, with clear definitions of what kind of data is withheld and within what geographic area, protects the reliability of the rest of the LEIS.

Unfortunately, a classified supplement also presents some problems. One of these is that most members of Congress will not have adequate clearances to read it. However, they will be able to read the rest of the LEIS with the confidence that nothing is being silently omitted.

Another problem with a classified supplement is determining what kind of data belongs in it. For example, should information on area roads be withheld from the open LEIS, even if they appear on USGS topographic maps? Should the classified supplement include inherently unclassified data such as natural and cultural resources on PLO 1662 land, or should this data be provided in the public LEIS?

The Air Force has never had to deal with these problems because it has never said more than a few sentences publically about anything within the PLO 1662 land. About all it has acknowledged is that it "does have facilities at Groom Dry Lake." This longstanding silence about the area presents a "Catch-22" to the Air Force, because a generation of secretive behavior and protocols must now be modified. If the Air Force acknowledges that roads exist, then can employees reveal that they use the roads? If a survey has been conducted of natural resources, can the person who conducted it come forward to acknowledge his role?

For years, the official policy about the base at Groom Lake is that it "doesn't exist," and personnel who work at the facility or who are professionally aware of it are instructed to say nothing at all. Now, somebody must say something, at least to define what is classified, or the LEIS will be an ineffective document.

Glenn Campbell

12/30/98

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