

Directorate of Public Works, Environmental Division, (DPW-E)
Conservation Branch
Attn: John Kipp, Ph.D.
NEPA Planner
Building 624, Room 127
624 Pleasonton Ave
USAG Fort Bliss, TX 79916

NOTE: Sent via email per your notification letter postmarked July 12, 2017

SUBJECT: addendum to my comments of August 3, 2017 for Stakeholder Comments for; “Environmental Assessment for Fort Bliss Local Flying Area and Local Flying Rules (FB 95-1), Fort Bliss, Texas and New Mexico” and “Draft FINDING OF NO SIGNIFICANT IMPACT” for that same EA.

September 3, 2017

Dr. Kipp,

I see that the comment period for this Environmental Assessment has been extended. I have additional comments to the ones I submitted to you on August 3, 2017.

ADDENDUM COMMENT A: The Army's EA marginalizes the private homeowners whose land is under the new, expanded training area by calling their homes, I quote the Army LFA EA: “*sparsely populated areas*” and implying impacts are less important for some people over others. “Sparsely” does not mean no one lives there. Impacts to residents, sparsely populated or not, are real and the losses from low, heavy, noisy, night flying helicopters are real. Denigrating rural residents as unimportant is poor practice by the Army. The health, welfare and environment is important for all of us. Yet the Army uses the word “sparsely” as partial justification for low flight over private property that causes 80 mph winds, 100+ dB of noise and increased risk. The Army fails to define the word sparsely. Referencing the MERRIAM-WEBSTER dictionary I find that the definition is imprecise with no specific measurement. Santa Fe, NM is sparsely populated compared to New York City. Would Santa Fe qualify for a low altitude helicopter combat training area? I ask that the Army discuss in this EA what, exactly, they consider “sparsely populated”. Give a number. Further I ask at what point in “sparseness” do people lose their rights? At what “sparseness” level is it okay to expose residents to high noise, vibration and risk? I believe the exact sparseness measurement is central to the Army justification for low altitude combat training over the public. Yet no precise measurement is given, why? A chart showing Sparseness (measurement) vs “Acceptable” Environmental Degradation (according to the Army) should be provided. This would allow stakeholders and politicians to better understand the environmental impacts for this EA and the Army's logic in their alternative selection. I'll reiterate, the Army uses “sparsely populated” as partial justification for the preferred Alternative, yet fails to give a meaningful measurement. Without some yardstick how can Alternatives be compared? How can we assess impacts?

ADDENDUM COMMENT B: Cumulative impacts are marginalized by the Army in the EA. For example, the EA discusses HAMETS and the LNF but fails to discuss the greatest cumulative environmental impacts. I quote the EA:

“The helicopter training flights proposed for HAMETS are separate from normal cross-country flights in the LFA and are an entirely separate action from the one analyzed in this document. It

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would, however, add additional noise disturbance in the Lincoln National Forest which would be assessed in the HAMETS EA. Because the Lincoln National Forest is a noise-sensitive zone for the Fort Bliss”

AND (emphasis added):

*“LFA traffic would be separated from any future HAMETS operations to avoid airspace conflicts with HAMETS operations. The two operations would therefore not occur simultaneously. **Due to the high altitude used and the separation of the two activities, a negligible contribution to cumulative noise impacts would be experienced when this action is combined with the HAMETS. It is important to note that the number of flights experienced over the forest at 2,000 feet AGL as a part of the LFA training would not change from those experienced since 2007 when the CAB was first stationed on Fort Bliss.**”*

While the Lincoln Nation Forest is an important stakeholder, it is not the only stakeholder impacted by the planned Army helicopter operations. Yet the Army only discusses the USFS/LNF and ignores other affected stakeholders. HAMETS and the LFA expansions both affect stakeholders outside the LNF. In fact, since both HAMETS and LFA **allow flight much lower (down to 100' – 500' AGL)** over private and BLM lands it is accurate to state that these stakeholders will be more adversely impacted than the LNF. Yet they are ignored by the Army LFA EA. Since the number of low altitude flights over these stakeholders will increase from HAMETS and the planned changes in the LFA routes (to and from the new, expanded, low altitude training areas) there is a significant, increased impact for these stakeholders and to their environment. Perhaps these flights will not occur “*simultaneously*” as stated in the EA (see above), but that has little to do with cumulative impacts. The EA ignores these significant cumulative impacts from new routes. It ignores the affected stakeholders. It is factually incorrect. A lie by omission.

ADDENDUM COMMENT C: (Cumulative impacts) The Army LFA is factually incorrect (again). The LFA EA asserts, I quote the EA:

“No other air operations were identified within the Fort Bliss LFA that would contribute to cumulative airspace impacts; therefore, cumulative airspace impacts for the Proposed Action would be minor.”

The EA discusses one Holloman AFB EA to restructure Restricted Air Space. The Draft EA is titled “*Environmental Assessment for Holloman Air Force Base F-16 Use in White Sands Missile Range R-5111 C/D Airspace*”. The Army LFA EA then leads readers to believe that no other Holloman AFB actions are in the planning stage. This is factually false. The Army in the LFA EA has failed to discuss a critical Holloman AFB proposal. The U.S. Air Force is planning on, I quote the USAF: “*optimizing the training airspace at Holloman AFB*”. In fact this USAF EIS affects (among many areas) the Talon MOA Low, which is also affected by this Army LFA EA “Preferred Alternative”. How can this not be significant? In addition, besides Talon MOA Low, the Air Force also plans significant expansion in both number of flights and flight areas. These affected areas overlap the Army's planned routes in the LFA EA (and possibly HAMETS). Despite this obvious project overlap, and despite the likely significant cumulative impacts, the Army LFA EA completely ignores this Air Force project. In my view this is poor performance by the Army. It certainly fails the NEPA requirements. I ask that the Army coordinate with the Air Force. I ask that the Army LFA EA “team” offer a real analysis of cumulative impacts to the environment, complete with real numbers, not the misinformation

offered in this EA. Please no more platitudes or vague information such as, I quote the Army LFA EA:

*“cross-country flights from Biggs AAF at 500 to 2,000 feet AGL (USAF 2016). Jet noise would also contribute to cumulative noise effects on the ground in WSMR airspace, but the **level of those effects cannot be determined at this time.**”*

And

*“any **significant increase** in noise impacts within populated areas.”*

And

“No cumulative impacts on Environmental Justice or Protection of Children were identified.” (no local route information provided, only “coarse” data)

Stakeholders need real information, including real numbers and real data to judge environmental impacts and alternatives. Claiming without data is not helpful and not NEPA compliant.

COMMENT: In my opinion the EA shows haste rather than comprehensiveness, and that is being kind in assuming the numerous false statements are “accidents” or ignorance.

COMMENT: The result of all the misinformation and misstatements is a dangerous mis-characterization of the environmental impacts from the alternatives, especially the preferred alternative (all the alternatives are affected by the poor information offered as fact in the EA). Little of this Environmental Assessment is accurate or complete. The resulting FNSI is tainted and absurd.

COMMENT: I ask that the NEPA process for this proposed action be restarted and the flawed Environmental Assessment/FNSI be discarded. Correcting the multitude of errors will require a comprehensive rewrite anyway, why not also allow stakeholders to help with NEPA scoping by soliciting scoping comments from all stakeholders? Why not hold local scoping meetings, especially in the most affected communities?

Thank you again for the opportunity to provide these few comments. With more time, and better information about the project, my neighbors and I could provide even more helpful feedback.

Sincerely,



Walt Coffman
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“We have met the enemy and he is us” – Pogo