

Peaceful Skies Coalition
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VIA E-MAIL

Andrew.Gomolak@us.af.mil

Commander
1210 Forty Niner Rd, Building 811
Holloman Air Force Base, N.M. 88330

Re: FONSI - *Environmental Assessment, Interim Relocation of Two F-16 Squadrons*

Peaceful Skies Coalition (PSC) is submitting comments on the proposed Interim Relocation of Two F-16 Squadrons from Hill to Holloman. The Commenter requests that Carol Miller, President of the Peaceful Skies Coalition, be placed on the recipient list to receive notice of any developments in the NEPA process as it moves forward. The Commenter further requests that these comments be included as part of the administrative record.

Peaceful Skies Coalition believes that this proposal should be withdrawn because, among the technical problems with the NEPA document itself, which are addressed below, Holloman has failed to establish a need for this project. The F-35 was promoted to Congress and the American people as a cost-saving replacement aircraft. Earlier aircraft were to be phased out. Whether due to ongoing problems with the F-35 such as cost-overruns, delayed delivery, or the continued failure of the aircraft to perform as promised, the public needs to learn what has led to the recommendation for expanded deployment of the F-16s in the already over-crowded New Mexico airspace.

The alternative of removing these two squadrons from service through storage at the Davis-Monthan Boneyard is a reasonable alternative that should have been included in the EA options for the F-16s from Hill.

• *Adjacency of Current and Other Proposed Federal Projects*

In order for the public to provide informed comment on the proposed relocation of F-16s, the public needs to be provided all information about adjacent and other proposed federal projects; whether those on public lands, private lands, military land, waterways, or airspace. In July of 2016, Peaceful Skies Coalition submitted comments on a proposal by Fort Bliss to conduct operations in the Sacramento Ranger District of the Lincoln National Forest. At a minimum, the proposed Fort Bliss HAMET and its resultant increase in air traffic should be included in this Holloman EA as the two proposed increases in activities will overlap in the same airspace.

A bioregional approach is essential to an accurate impacts analysis. The lands within the boundary areas comprise only a part of the larger bioregion. Avian flyways, watersheds, wildlife migratory pathways, air and water quality and other natural systems extend well beyond the boundaries of the proposed project.

• ***Federal Agencies Must Establish a Comprehensive Baseline for proposed NEPA Actions***

The Peaceful Skies Coalition, has repeatedly and again with this comment, calls on the DoD to establish a proper baseline upon which to base all DoD impact analyses. A trends analysis, is mandated by law to assure an independent assessment of the environmental impacts of all activities affecting the various resources over an extended period of time. By failing to properly define the baseline and from the baseline engage in a trends analysis, it is not possible to identify and track effects and changes that occur over time.

Indirect Impacts.

The NEPA review process requires carefully analysis of the indirect effects of proposed actions. Indirect effects are effects that are caused by the action but occur later in time or are further removed in distance. See 40 C.F.R. § 1508.8 (b). Indirect effects “may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.” *Id.* Here, the indirect effects shall include, but are not limited to, negative socioeconomic impacts, environmental injustice impacts, and the negative impacts to tourism, public health, hunting, and recreation that will result from the proposal.

The EA does not establish a proper geographic scope or boundary for a cumulative impacts analysis despite the fact that the proposed action will have direct, indirect, and “additive” effects on resources far beyond the immediate area. By way of example, for resident or migratory wildlife, the appropriate geographic area for the cumulative impacts analysis is the species habitat consisting of breeding grounds, migration routes, wintering areas, and the total range of affected population units. NEPA documents are required to include other state, private, and federal actions as well as natural occurrences or events that have taken place, are taking place, or proposed to take place that will similarly impact the region’s wildlife populations and habitat, and human communities.

Cumulative Impacts.

The Federal courts have ruled that the government “cannot isolate a proposed project, viewing it in a vacuum.” The NEPA review process requires taking a hard look at the cumulative impacts of the proposed action. A cumulative impact is “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.” 40 C.F.R. § 1508.7.

With respect to the proposed increase in F-16 basing, properly analyzing cumulative effects must include: (1) identifying the significant cumulative effects issues associated with the proposed action; (2) establishing the proper geographic scope for the analysis; (3) establishing an appropriate time frame for the analysis; and (4) identifying other actions affecting the resources, ecosystems, and/or human communities of concern.

• ***Controversial Proposal Requires an EIS – Magnitude of Increased Operations***

An EA is insufficient for exponential increases in both the numbers of flights and the volumes of chaff, flares, munitions and other ordnance. It is not sufficient to say the base already does X and Y

is being added so there are no cumulative effects as this EA does on pages 2-12 to 2-14.

+ Adding more than a half a million rounds of munitions each a year (n=544,613/year) is significant and the impacts need to be addressed in more detail.

+ More than doubling the number of F-16 flights to 260 per day adds up to 94,848 flights a year. In addition to increased noise and environmental pollution, many of the proposed flights are to be supersonic causing a range of negative physical health impacts to humans, wildlife, and farm animals.

The EA states that “Sonic booms can be annoying and cause startle reaction in humans and animals. On occasion, sonic booms could cause physical damage (e.g., to a window) depending on the boom pressure level.” (pdf page 55). Not addressing cumulative effects of this expansion on top of existing operations isolates this project and does not present mitigation of negative impacts already reported by residents in the area. Startle reactions are a recognized cause of negative health impacts as is exposure to noise. For example, recent studies have documented the relationship between noise and cardiovascular disease.

The EA states that the “HAPs (hazardous air pollutants) emitted from mobile sources such as F-16 operations under the Proposed Action are called Mobile Source Air Toxics, which include benzene, aldehydes, 1,3-butadiene, and a class of compounds known as polycyclic aromatic hydrocarbons” (pdf page 52). No discussion of cumulative impacts of these pollutants is in the EA.

Table 4-4. Proposed Net Increase in F-16 Flight Operations at Holloman AFB

| Scenario | Unit | Aircraft | Annual Departures | Annual Arrivals | Annual Closed Patterns | Total Annual Operations | Total Daily Operations |
|--------------------------------------|-------|----------|-------------------|-----------------|------------------------|-------------------------|------------------------|
| Existing 2017/No-Action Condition | 54 FG | F-16C | 8,640 | 8,640 | 27,648 | 44,928 | 123 |
| Total Operations Under Alternative 1 | 54 FG | F-16C | 18,240 | 18,240 | 58,368 | 94,848 | 260 |
| Net Increase under Alternative 1 | | | 9,600 | 9,600 | 30,720 | 49,920 | 137 |

54 FG = 54th Fighter Group
 AFB = Air Force Base

• Controversial Proposal Requires an EIS – Endangered and Threatened Wildlife

Page 70 of the EA contains the following chart of threatened and endangered species that might potentially be impacted by increased operations.

Table 3-16. Federally Listed and State-Listed Threatened and Endangered Species Potentially Present at Holloman AFB

| Common Name | Scientific Name | Federal Status | State Status |
|--------------------------|--|----------------|--------------|
| Plants | | | |
| Sacramento prickly poppy | <i>Argemone pleiacantha</i> ssp. <i>pinnatisecta</i> | Endangered | Endangered |

| | | | |
|------------------------------|--|--|------------|
| Sacramento Mountains thistle | <i>Cirsium vinaceum</i> | Threatened | Endangered |
| Wright's marsh thistle | <i>Cirsium wrightii</i> | Candidate | Endangered |
| Kuenzler hedgehog cactus | <i>Echinocereus fendleri</i> var. <i>kuenzleri</i> | Endangered | Endangered |
| Todsens's pennyroyal | <i>Hedeoma todsenii</i> | Endangered | Endangered |
| Fish | | | |
| White Sands pupfish | <i>Cyprinodon tularosa</i> | -- | Threatened |
| Birds | | | |
| Baird's sparrow | <i>Ammodramus bairdii</i> | -- | Threatened |
| Burrowing owl | <i>Athene cunicularia</i> | -- | SGCN |
| Ferruginous hawk | <i>Buteo regalis</i> | -- | SGCN |
| Scaled quail | <i>Callipepla squamata</i> | -- | SGCN |
| Costa's hummingbird | <i>Calypte costae</i> | -- | Threatened |
| Mountain plover | <i>Charadrius montanus</i> | -- | SGCN |
| Snowy plover | <i>Charadrius nivosus</i> | Threatened | SGCN |
| Yellow-billed cuckoo | <i>Coccyzus americanus</i> | Threatened | SGCN |
| Northern aplomado falcon | <i>Falco femoralis</i> | Experimental Population, Non-Essential | Endangered |
| Peregrine falcon | <i>Falco peregrinus</i> | -- | Threatened |
| Bald eagle | <i>Haliaeetus leucocephalus</i> | Delisted | Threatened |
| Brown pelican | <i>Pelecanus occidentalis</i> | Delisted | Endangered |
| Neotropic cormorant | <i>Phalacrocorax brasilianus</i> | -- | Threatened |
| White-faced ibis | <i>Plegadis chihi</i> | -- | SGCN |
| Least tern | <i>Sternula antillarum</i> | Endangered | Endangered |
| Mexican spotted owl | <i>Strix occidentalis lucida</i> | Threatened | SGCN |
| Mammals | | | |
| Spotted bat | <i>Euderma maculatum</i> | -- | Threatened |
| Mule deer | <i>Odocoileus hemionus</i> | -- | SGCN |
| Penasco least chipmunk | <i>Tamias minimus atristriatus</i> | Candidate | Endangered |
| Meadow jumping mouse | <i>Zapus hudsonius luteus</i> | Endangered | Endangered |

The public is assured in the EA that no impacts will occur from the increase in operations. By minimizing the potential environmental impacts, the public is misled into seeing the area as non-critical habitat. This is obfuscation.

Using the Mexican Spotted Owl, just one of the 26 species listed above, Holloman asserts that no harm will be done. The presence of the owl is barely addressed, brushed aside. This treatment is a stark contrast a warning published in a Lincoln National Forest document, *Southern Sacramento Mountains Restoration Project, CFLRP Proposal, Lincoln National Forest, 2011*. This more comprehensive document describes the area as critical habitat (emphasis added):

- The proposed area is **significant socially, ecologically, and economically**. ... Ecologically, **the area contains the largest number of Threatened and Endangered species (namely, Mexican Spotted Owl or *Strix occidentalis lucida*) per acre within the Southwestern Region.** (page 7)

- Areas within the SSMRP currently designated as Mexican Spotted Owl protected activity areas, or northern goshawk nest areas can also be de facto old growth target areas. (page 9)
Source: Southern Sacramento Mountains Restoration Project, CFLRP Proposal, Lincoln National Forest, 2011
<http://www.fs.fed.us/restoration/documents/cflrp/2011Proposals/Region3/Lincoln/LNFCFLRPProposal.pdf>

More information about endangered, threatened and protected species and locations of protected areas need to be shown on the maps included in the EA.

In *Environmental Effects of Self Protection Chaff and Flares Final Report by the Air Force Command* published in 1997, special treatment to avoid negative impacts is recommended when using chaff and flares. Fire prevention and reduction of toxic releases from chaff and flares have not been substantively addressed in the EA. The recommended AF procedure for protecting groundwater from chaff and flares, was not addressed in the EA. The cited report states that “Adverse effects to sensitive aquatic organisms, although unlikely, may be possible in certain small, confined water bodies. These should be addressed on a case-by-case basis in areas proposed for chaff use that include highly sensitive aquatic habitats.” Water is precious everywhere, but here in arid New Mexico water itself is an endangered element. Extra protection, case-by-case protection is warranted.

• ***Unacceptable Risk of Fire Danger***

National forests across the state of New Mexico have suffered tremendous forest fires over recent decades and extreme drought during the last five years. As a result, the forests are under extreme stress. Despite being subject to various forest management and treatment practices, the reality is that uncontrolled fires continue to threaten the forest, grasslands, eco-systems and affected communities of the southeast quadrant of the state.

The EA identifies chaff and flares as fire hazards, but states that existing regulations cited below as adequate. “Training would also include the use of RR188 training chaff in accordance with the Training Chaff Permit, and use of MJU-7 flares. ... MJU-7 flares would not be deployed during periods of “Very High” or “Extreme” fire danger. During periods of “High” fire danger, aircraft would not flare below FL180 [18,000 feet]. If fire danger is less than “High” the minimum altitude for flare release would be 2,000 feet above ground level (AGL).” Page 2-14.

Despite the assurances of no harm, in 2007 a flare from an F-16 caused a catastrophic fire in New Jersey when the “F-16 accidentally deployed a flare too low 25 miles north of Atlantic City, N.J., inside the Warren Grove Gunnery Range. ... Walls of flames 100 feet high raced toward senior citizen communities. No one died in the fire, but 6,000 people were evacuated, more than 17,000 acres burned and 13 homes were destroyed or damaged, according to news reports.”
<http://tinyurl.com/mhkr8kd>

This *Environmental Assessment, Interim Relocation of Two F-16 Squadrons* does not provide sufficient information about fire prevention, fire suppression, and evacuation plans.

• ***Maps Included in the Scoping Document are Incomplete***

Peaceful Skies Coalition again requests that all NEPA actions by or on behalf of the Department of Defense require informational maps in each and every NEPA document. Informational maps need to include clear outlines of state and federal public lands, waters, tribal lands, adjacent and nearby MOAs, restricted airspace, and other potentially overlapping projects by military, other government, public or private operations.

If you have any questions or comments, or wish to discuss the issues raised in this comment please do not hesitate to contact the Peaceful Skies Coalition representative.

Sincerely,

A handwritten signature in black ink that reads "Carol Miller". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Carol Miller

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